

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

M.E. DEY & CO., INC.,	)	
<i>Complainant,</i>	)	
	)	
v.	)	
	)	
HAPAG-LLOYD (AMERICA) LLC	)	<b>DOCKET NO. 22-35</b>
	)	
	)	
<i>Respondent.</i>	)	
	)	

**RESPONDENT’S MOTION TO DISMISS**

Pursuant to 46 C.F.R. §502.69, Respondent Hapag-Lloyd (America) LLC hereby moves for an order dismissing with prejudice the complaint against Hapag-Lloyd (America) LLC in its entirety.

A memorandum in support of this motion is submitted herewith.

Respectfully submitted,



Wayne R. Rohde  
COZEN O’CONNOR  
1200 Nineteenth Street, NW  
Suite 300  
Washington, DC 20036  
(202) 463-2504

Dated: January 17, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of January 2023, the foregoing Respondent's Motion to Dismiss was served via electronic mail on:

Brendan Collins  
bcollins@gkglaw.com

A handwritten signature in black ink, appearing to read "Wayne R. Rohde", is written above a horizontal line.

Wayne R. Rohde