

BEFORE THE FEDERAL MARITIME COMMISSION

M.E. DEY & CO. INC.

Complainant,

v.

HAPAG-LLOYD AG and HAPAG LLOYD
(AMERICA) LLC,

Respondents.

Docket No. 22-35

**RESPONDENTS' REPLY TO MOTION FOR LEAVE TO INTERVENE BY
BUREAU OF ENFORCEMENT, INVESTIGATIONS, AND COMPLIANCE**

Respondents Hapag-Lloyd AG and Hapag Lloyd (America) LLC (together, “Respondents”), through counsel, hereby respond to the Motion for Leave to Intervene filed by the Bureau of Enforcement, Investigations, and Compliance (the “Motion”) in this proceeding.

Respondents take no position on the merits of the Motion. Respondents submit this reply solely for purposes of noting for the record their disagreement with the manner in which the facts relating to this proceeding are characterized in the Motion.

Dated: April 7, 2023

Respectfully submitted,

By: /s/ Wayne R. Rohde

Wayne R. Rohde

Rachel Schwartz

Cozen O'Connor

1200 19th Street NW

Washington, DC 20036

(202) 463-2507

wrohde@cozen.com

rschwartz@cozen.com

CERTIFICATE OF SERVICE

I certify that, on April 7, 2023, a true copy of the foregoing reply was filed via electronic mail with the Secretary of the Federal Maritime Commission, and a copy was served via electronic mail on the following counsel:

Brendan Collins, Esq. (bcollins@gkglaw.com)
Counsel for M.E. Dey & Co. Inc.

Jonathan Todd, Esq. (jtodd@fmc.gov)
Theron Korsak, Esq. (tkorsak@fmc.gov)
*Bureau of Enforcement, Investigations, and Compliance
Federal Maritime Commission*

Dated: April 7, 2023

/s/ Wayne Rohde

Wayne Rohde
Cozen O'Connor