

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 23-05

RAHAL INTERNATIONAL, INC.,
Complainant,

v.

HAPAG-LLOYD AG,
HAPAG-LLOYD (AMERICA) LLC,
HAPAG-LLOYD USA, LLC
Respondents.

JOINT STATUS REPORT

The Complainant Rahal International, Inc. and Respondents Hapag-Lloyd AG, Hapag-Lloyd (America), LLC, and Hapag-Lloyd USA, LLC (collectively “Hapag”), jointly submit this Joint Status Report pursuant to Rule 141(h):

1. INITIAL DISCLOSURES

Rule 141(b) initial disclosures were served on **August 8, 2023**.

2. PROPOSED PROCEDURAL SCHEDULE

The parties propose the following procedural schedule for the completion of discovery within the time contemplated by Rule 141(g):

(a) Initial discovery requests, including production of documents, admissions, and interrogatories, shall be served by **September 5, 2023**. The service of initial discovery requests does not foreclose a party from timely serving additional or supplemental discovery requests irrespective of whether the party filed an initial request of the same nature.

(b) Motions to add or join additional parties shall be served by **September 5, 2023**.

(c) Objections and reservations, if any, to initial discovery requests shall be served by **September 29, 2023**.

(d) Responses to initial discovery requests shall be served by **October 6, 2023**.

(e) Depositions of factual witnesses and experts for whom a written report is not required shall be completed by **November 27, 2023**.

(f) Each party's expert report(s) addressing any issue(s) upon which that party bears the burden of proof shall be served by **December 4, 2023**.

(g) Expert rebuttal reports shall be served by **December 18, 2023**.

(h) All factual and expert discovery shall be completed by **December 29, 2023**.

3. DISPOSITIVE MOTIONS

One or more of the Hapag Respondents will file partially or wholly dispositive motions during week of August 21, 2023.

4. CONFIDENTIALITY AGREEMENT/PROTECTIVE ORDER

The parties will be discussing a confidentiality agreement to protect sensitive information produced in discovery. That agreement may be submitted to the Presiding Officer for issuance as a protective order.

Dated: August 18, 2023

Respectfully submitted,

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