

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 23-05

RAHAL INTERNATIONAL, INC.,
Complainant,

v.

HAPAG-LLOYD AG and
HAPAG-LLOYD (AMERICA) LLC,
Respondents–Third-Party Complainants,

v.

MAHER TERMINALS LLC,
GCT NEW YORK LP, and
GCT BAYONNE LP,
Third-Party Respondents.

JOINT STATUS REPORT

Complainant Rahal International, Inc. (“Rahal”), Respondents–Third-Party Complainants Hapag-Lloyd AG and Hapag-Lloyd (America), LLC (collectively, “Hapag”), and Third-Party Respondents Maher Terminals LLC (“Maher”), GCT New York LP and GCT Bayonne LP (collectively “GCT”) hereby submit this Joint Status Report in accordance with and as a follow up to the Joint Status Report dated October 23, 2023 that was previously submitted by the parties (the “10/23/23 Report”).

The 10/23/23 Report set forth, among other thing, the parties’ agreement to reconvene on November 20, 2023 to discuss and propose a joint global schedule for the completion of written/paper discovery relating to Third-Party Respondents, considering the status of the case with a principal focus on the disposition of GCT’s Motion to Dismiss,

and a commensurate extension to certain deadlines set forth in the 8/21/23 Scheduling Order.

As a result of scheduling conflicts impacting counsel for the parties, counsel agreed to meet by way of email on November 20, 2023. During their “meeting,” the parties collectively agreed they require an extension of the operative deadlines set forth in the 8/21/23 Scheduling Order. Counsel further agreed that, with GCT’s Motion to Dismiss pending, the time is not yet ripe for the formulation of a global discovery schedule. As a result, the parties agreed to reconvene on November 29, 2023 at 2:00 p.m. to discuss whether there have been developments in the interim making it appropriate to work collectively on a global discovery schedule at that time.

Dated: November 22, 2023

Respectfully submitted,

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