

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

RAHAL INTERNATIONAL, INC., <i>Complainant,</i>	)	
	)	
v.	)	
	)	
HAPAG-LLOYD USA, LLC	)	<b>DOCKET NO. 23-05</b>
	)	
<i>Respondent.</i>	)	

**RESPONDENT’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to 46 C.F.R. §§502.69 and 502.70, Respondent Hapag-Lloyd USA, LLC hereby moves for an order of summary judgment in its favor with respect to the entirety of the complaint in this proceeding.

A memorandum in support of this motion is submitted herewith.

Respectfully submitted,



Wayne R. Rohde  
Katie Sobotta  
Rachel Schwartz  
COZEN O’CONNOR  
1200 Nineteenth Street, NW  
Suite 300  
Washington, DC 20036  
(202) 463-2507

Dated: August 22, 2023