

**BEFORE THE
FEDERAL MARITIME COMMISSION**

RAHAL INTERNATIONAL, INC.,)	
<i>Complainant,</i>)	
)	
v.)	
)	
HAPAG-LLOYD AG AND HAPAG-LLOYD (AMERICA) LLC)	
)	DOCKET NO. 23-05
)	
<i>Respondents.</i>)	
)	

RESPONDENTS' PARTIAL MOTION TO DISMISS

Pursuant to 46 C.F.R. §502.69, Respondents Hapag-Lloyd AG and Hapag-Lloyd (America) LLC hereby move to dismiss with prejudice Complainant's claim for \$198,798.11 in damages for Rahal's deteriorated, spoiled or otherwise unfit fruit product.

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