

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 23-09

HUBBELL INCORPORATED,

and HUBS, INC.,

COMPLAINANTS,

v.

DSV AIR & SEA, INC.,

and

DSV OCEAN TRANSPORT A/S, RESPONDENTS.

JOINT MOTION TO AMEND SCHEDULING ORDER

Respondents DSV Air & Sea, Inc. and DSV Ocean Transport A/S (together, “DSV” or “Respondents”), by their respective undersigned counsel, hereby request to amend the Scheduling Order, dated October 18, 2023 (the “Scheduling Order”). Complainants Hubbell Incorporated and Hubs, Inc. (together, “Hubbell” or “Complainants” and collectively with Respondents the “Parties”) join Respondents in making this making this motion.

The Parties have been working diligently on discovery in accordance with the Scheduling Order. The Parties have exchanged initial disclosures and discovery requests and have been undertaking collection and review of documents. However, in light of a larger than anticipated volume of documents at issue, Respondents need additional time to collect and produce requisite documents and discovery responses. Complainants’ have also encountered a large volume of documents pursuant to the requests and would benefit from the additional time requested. Additionally, although not the basis for the instant request, the Parties have scheduled a mediation

before the Office of Consumer Affairs & Dispute Resolution Services (“CADRS”) on January 9, 2024, and the brief extension of the discovery deadlines would help facilitate the Parties’ engagement and preparation in dispute resolution efforts. Thus, the Parties respectfully submit that good cause exists to amend the Scheduling Order by 30 days.

This is the first request for an extension in this proceeding. The Parties submit that the requested extension is reasonable under the circumstances and necessary to ensure the development of a full and complete record. The Parties submit that the proposed extension would not cause undue prejudice or delay and that this request is being made in good faith. Therefore, the Parties submit that the remaining deadlines be amended to reflect a 30-day extension, as follows:

Event	Current Deadline	Requested Deadline
Discovery responses due and completion of document production	December 20, 2023	January 19, 2024
Begin fact deposition	January 15, 2024	February 15, 2024
Complete fact depositions	January 30, 2024	February 29, 2024
Close of all discovery	February 19, 2024	March 20, 2024
Complainant’s brief, proposed findings of fact, and appendix	March 8, 2024	April 8, 2024
Respondent’s opposition brief, responses to proposed findings of fact, proposed findings of fact, and appendix	April 5, 2024	May 6, 2024

Complainant's reply brief and responses to proposed findings of fact	April 19, 2024	May 20, 2024
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Thus, for the foregoing reasons, it is respectfully requested that the Scheduling Order be amended as proposed above.

Dated: December 18, 2023

Respectfully Submitted By:

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

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