

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

**DOCKET NO. 23-11**

**BAL CONTAINER LINE CO., LIMITED,  
Complainant,**

**v.**

**SSA MARINE TERMINAL and  
SSA TERMINALS (PIER A), LLC  
Respondents.**

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**JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to 46 C.F.R. §§ 502.69 and 502.71, Complainant BAL Container Line Co., Limited (“BAL”) and Respondents SSA Marine Terminal and SSA Terminals (Pier A), LLC (together “SSA”) hereby respectfully request that SSA be granted a thirty (30) day extension of time (to December 13, 2023) to file an answer to the complaint (“Complaint”) in this proceeding. The reasons supporting this request are set forth below.

First, the parties are engaged in discussions that may lead to the amicable resolution of this matter, either directly or via mediation (which is also being discussed by the parties). The filing of an answer triggers a number of procedural deadlines, and it would be difficult for the parties to comply with those deadlines at the same time they are discussing possible resolution of the matter. Second, an extension will afford counsel for the parties time to discuss procedural issues relating to the Complaint that may simplify the proceeding in the event it is not resolved entirely. These issues include the possible dismissal of one of the named respondents.

In light of the foregoing, the parties respectfully request that SSA be granted until December 13, 2023 to file a response in this proceeding.

Respectfully submitted,

COZEN O'CONNOR

KEESAL, YOUNG & LOGAN

/s/ Wayne Rohde

/s/ Shahed Abualsamen

By: Wayne Rohde  
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Counsel for SSA Marine Terminal  
and SSA Terminals (Pier A), LLC

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Shahed Abualsamen  
Counsel for BAL Container  
Line Co., Limited

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9<sup>th</sup> day of November, 2023, served the foregoing Joint Motion for Extension of Time to File Answer on:

Bryce M. Cullinane, Esq.  
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/s/ Wayne Rohde

Wayne Rohde