

**BEFORE THE FEDERAL MARITIME COMMISSION
WASHINGTON, D.C.**

-----X	:	
20240930-DK-BUTTERFLY-1, INC., F/K/A	:	
BED BATH & BEYOND, INC.,	:	
	:	
Complainant,	:	
	:	
v.	:	FMC Docket No.: 23-12
	:	
MSC MEDITERRANEAN SHIPPING	:	
COMPANY SA	:	
	:	
	:	
Respondent.	:	
-----X	:	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Complainant and Respondent, by and through the undersigned counsel, jointly move pursuant to Rule 46 C.F.R. § 502.141(j) of the Commission’s Rules of Practice and Procedure, for entry of a protective order in connection with the above-captioned proceeding. Issuance of a protective order is necessary and required to enable the parties to fully respond to discovery requests, which may cover information and documents that are confidential, proprietary, and/or commercially sensitive. A proposed protective order is attached for consideration by the Presiding Officer.

The parties have jointly drafted and agreed to the terms of the Protective Order attached hereto and request that the Presiding Officer grant this Joint Motion for Entry of Protective Order.

Dated: June 13, 2024

Respectfully submitted,

HUTH REYNOLDS LLP

/s/ Gregory A. Crapanzano

Karl C. Huth

(212) 731-9333

huth@huthreynolds.com

Matthew J. Reynolds

(646) 872-9353

reynolds@huthreynolds.com

Gregory A. Crapanzano II

(917) 575-3440

gcrapanzano@huthreynolds.com

*Counsel for Complainant 20230930-
DK-Butterfly-1, Inc.*

COZEN O'CONNOR, P.C.

/s/ Wayne R. Rohde

Wayne R. Rohde

Christopher Raleigh

Kathryn Sobotta

Rachel Schwartz

1200 Nineteenth Street NW

Suite 300

Washington, DC 20036

Telephone: (202) 463-2507

**COUNSEL FOR RESPONDENT
MSC MEDITERRANEAN
SHIPPING COMPANY SA**