

**Before the
FEDERAL MARITIME COMMISSION**

Docket No. 24-10

TZ SSE Buyer, LLC, Complainant v. Yang Ming Marine Transport Corp., Respondent

JOINT MOTION TO EXTEND BRIEFING DEADLINES

Complainant TZ SSE Buyer, LLC (“Complainant”) and Respondent Yang Ming Marine Transport Corp. (“Respondent,” and together with Complainant, the “Parties”) jointly move, pursuant to 46 C.F.R. § 502.102, to extend the briefing schedule by two weeks to allow Respondent additional time to respond to Complainant’s Amended Complaint, served on October 8, 2024. In support of this motion, the Parties state as follows:

1. On August 19, 2024, the ALJ entered a revised scheduling order [Docket No. 12] with the following relevant deadlines:

Task	Deadline
Complainants’ Brief, Proposed Findings of Fact, and Appendix	November 6, 2024
Respondent’s Opposition Brief, Response to Proposed Findings of Fact, Proposed Findings of Fact, and Appendix	December 4, 2024
Complainants’ Reply Brief and Responses to Proposed Findings of Fact	December 18, 2024

2. On September 27, 2024, the former complainants filed an unopposed motion for leave to file an amended complaint [Docket No. 13], which was granted by the ALJ on October 4, 2024. [Docket No. 14].

3. The Complainant’s verified amended complaint (the “Amended Complaint”) was served on Respondent by the FMC’s Office of the Secretary on October 8, 2024. [Docket No. 16]

4. Pursuant to the ALJ’s October 4, 2024 order, Respondent has until October 18, 2024, to file a response to the Amended Complaint. [Docket No. 14].

5. In accordance with 46 CFR §§ 502.69 and 71, the Parties conferred prior to filing this motion and agree that a brief extension of time is necessary to allow Respondent to prepare its response to the Amended Complaint and for Complainant to review it once it is filed.

6. Accordingly, the Parties request a two-week extension of the ALJ-ordered briefing deadlines, taking into account upcoming holidays. The Parties' specific request is as follows:

Task	Deadline
Complainants’ Brief, Proposed Findings of Fact, and Appendix	November 22, 2024
Respondent’s Opposition Brief, Response to Proposed Findings of Fact, Proposed Findings of Fact, and Appendix	December 20, 2024
Complainants’ Reply Brief and Responses to Proposed Findings of Fact	January 6, 2024

7. Good cause exists for this request, as Complainant recently amended its complaint, requiring Respondent to review the Amended Complaint and prepare a response, which Complainant will also need time to review.

8. This motion is not intended for the purposes of delay but rather to provide sufficient time for Respondent to respond to the recently served Amended Complaint, and for Complainant to review Respondent’s response.

WHEREFORE, the Parties respectfully request that the following revised schedule be adopted in this action:

- (a) Complainants' Brief, Proposed Findings of Fact, and Appendix on or before **November 22, 2024**;
- (b) Respondent's Opposition Brief, Response to Proposed Findings of Fact, Proposed Findings of Fact, and Appendix on or before **December 20, 2024**; and
- (c) Complainants' Reply Brief and Responses to Proposed Findings of Fact **January 6, 2024**.

Dated: October 9, 2024

Respectfully jointly submitted,

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