

**Before the
FEDERAL MARITIME COMMISSION**

Docket No. 24-10

**Impact Products, LLC *et al.*, Complainants v. Yang Ming Marine Transport Corp.,
Respondent**

JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE

Pursuant to the Commission’s Initial Order dated February 29, 2024 (“Initial Order”) and 46 C.F.R. § 502.141(h), Complainants Impact Products, LLC and Safety Zone, LLC (“Complainants”) and Respondent Yang Ming Marine Transport Corp. (“Respondent” and, collectively with Complainants, the “Parties”), by their respective undersigned counsel, have conferred and submit this joint status report and discovery schedule:

The Parties do not currently anticipate needing depositions or interrogatories in this case in excess of the amounts contemplated by 46 C.F.R. §§ 502.143 (i.e., no more than 20 depositions) and 502.145 (i.e., no more than 50 written interrogatories), respectively. The Parties propose the following discovery schedule:

Event	Deadline
Parties to make initial disclosures	April 12, 2024
Parties may serve initial written discovery requests	April 17, 2024
Complainant to name expert witnesses and serve expert reports, if any	June 3, 2024
Complainant’s expert, if any, to be deposed	June 28, 2024
Respondent to name expert witnesses and serve expert reports, if any	July 26, 2024

Discovery Ends, including completion of written discovery and oral fact and expert discovery:	August 12, 2024
Complainants' Opening Brief, Proposed Findings of Fact, and Appendix	September 11, 2024
Respondents' Response Brief, Proposed Findings of Fact, and Appendix	October 26, 2024
Complainants' Reply Brief and Responses to Proposed Findings of Fact	November 9, 2024

Pursuant to 46 C.F.R. Section 502.64(a), the Parties have reached out to the Consumer Affairs and Dispute Resolution Services (CADRS) via telephone (the Parties left a voicemail) and email to schedule a time for a preliminary conference with CADRS pursuant to the Initial Order.

Dated: March 22, 2024

Respectfully and jointly submitted,

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