

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 24-11

OL USA LLC

COMPLAINANT,

v.

MAERSK A/S,

RESPONDENT.

OL USA LLC'S RESPONSE TO MAERSK A/S'S MOTION TO COMPEL

Pursuant to 46 CFR § 502.150(a)(3), OL USA LLC ("OL USA") respectfully submits this Response to Maersk A/S's ("Maersk") Motion to Compel filed on June 6, 2024.

On April 5, 2024, Maersk served Requests for Admission, Document Requests, and Interrogatories. OL USA timely responded to Maersk's Requests for Admission but indicated that it would need some additional time to respond to Maersk's Document Requests and Interrogatories. The Parties have been in communication regarding OL USA's outstanding discovery responses, and OL USA has committed to providing responses in advance of the mediation scheduled for June 21, 2024. Accordingly, OL USA does not believe that the instant Motion to Compel is necessary. Nevertheless, OL USA agrees with the relief sought in Maersk's Motion to Compel. That is, OL USA will serve written responses to the Document Requests and Interrogatories and will produce those relevant, responsive documents it has collected and reviewed by June 17, 2024, and joins Maersk's request for a brief 30-day extension of the current March 20, 2024 Scheduling Order.

Dated: June 13, 2024

Respectfully submitted,

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

By: /s/ Kelly E. Mulrane

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Counsel to Complainant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of June, 2024, the foregoing Response to Maersk's Motion to Compel Discovery Responses was served via electronic mail on:

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/s/ Kelly E. Mulrane
One of the attorneys for OL USA LLC