

BEFORE THE
FEDERAL MARITIME COMMISSION

FMC DOCKET NO.
24-13

ACCESS ONE TRANSPORT, INC.
Complainant,

v.

COSCO SHIPPING LINES CO. LTD.
Respondent.

**JOINT MOTION FOR EXTENSION TO FILE THE OPPOSITION AND REPLY TO
RESPONDENT'S MOTION TO DISMISS**

1. On March 1, 2024, Access One Transport, Inc. (“Access One” or “Complainant”) filed a Verified Complaint, alleging COSCO Shipping Lines Co., Ltd. (“COSCO” or “Respondent”) violated various provisions of the Shipping Act. The rules of the Federal Maritime Commission (“FMC”) required that an Answer be filed no later than 25 days after service of the complaint, in this case, by March 25, 2024.
2. An unopposed consent motion was filed where COSCO sought and was granted a short extension to respond to the Complaint to April 8, 2024.
3. On April 8, 2024, COSCO filed its motion for partial dismissal of the complaint. As such any opposition to the motion is due April 23, 2024, and any reply thereto would be due seven days after service of the opposition.

4. After service of the motion on April 8, 2024, Counsel for Complainant was travelling from April 11 through 15, 2024. Unfortunately, after his return from the trip, Counsel for Complainant became ill and has now tested positive for Covid-19. As such a request was made to COSCO for a 14 day extension to file the opposition to the motion to May 7, 2024.

5. Counsel for COSCO also requested a short extension to file its reply to any opposition to May 15, 2024, due to other deadlines and commitments being incurred by them.

6. Both parties agree to the requested extensions and request the presiding officer to grant the extensions to allow each party a reasonable opportunity to fully brief the opposition and reply.

Date: April 19, 2024

Respectfully submitted,



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Attorneys for Respondent COSCO

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2022, the foregoing JOINT MOTION FOR EXTENSION TO FILE THE OPPOSITION AND REPLY TO RESPONDENT’S MOTION TO DISMISS has been served upon all interested persons and parties by electronic means pursuant to the below list.

Stephen M. Uthoff

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Counsel for Respondent COSCO

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