

**Before the
FEDERAL MARITIME COMMISSION**

Docket No. 24-13

Access One Transport, Inc.

v.

COSCO Shipping Lines Co., Ltd.

JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE

Pursuant to the Commission’s Initial Order dated March 4, 2024 (“Initial Order”) and 46 C.F.R. § 502.141(h), Complainant Access One Transport, LLC (“Complainant”) and Respondent COSCO Shipping Lines Co., Ltd. (“Respondent,” and, collectively with Complainant, the “Parties”), by their respective undersigned counsel, have conferred and submit this joint status report and proposed 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
Mediation Discussion with CADRS	June 26, 2024
Parties to make initial disclosures	June 28, 2024
Parties may serve initial written discovery requests as early as July 12, 2024 but in any event will serve initial discovery no later than July 19, 2024	July 19 2024
Complainant to identify expert witnesses, if any	Sept. 6 , 2024
Parties to serve objections and responses to written discovery requests per 46 CFR §§502.145, 502.146 and 502.147(b)(2)	30 days after service of discovery

Depositions of fact witnesses may begin to be noticed. Depositions may be conducted virtually, if practical	August 26, 2024
Complainant to serve initial expert reports, if any	September 13, 2024
Respondent to identify rebuttal expert witnesses, if any	September 27, 2024
Expert depositions may begin to be noticed, if any	October 4, 2024
Respondent to serve rebuttal expert reports, if any	Oct. 18, 2024
Last date to serve written discovery requests	Oct. 15, 2024
Complete Depositions of Fact and Expert Witnesses	Nov. 15, 2024
Discovery ends	Nov. 15, 2024
Complainants' Opening Brief, Proposed Findings of Fact, and Appendix	Dec. 13, 2024
Respondents' Response Brief, Proposed Findings of Fact, and Appendix	Jan. 20, 2025
Complainants' Reply Brief and Responses to Proposed Findings of Fact	February 3, 2025
Initial Decision Due	March 17, 2025

Pursuant to 46 C.F.R. Section 502.64(a) and the Initial Order, the Parties had a conference with CADRS on June 26, 2024. At present the Parties believe initial settlement discussions can occur directly among counsel. The Parties do not rule out a future formal mediation by CADRS or private mediation. An additional conference with CADRS is scheduled for August 15, 2024 to further explore the possibility of mediation with CADRS. The parties understand this does not impact the dates established herein.

Dated: June 27, 2024

Respectfully and jointly submitted,

THE UTHOFF LAW CORPORATION

Stephen M. Uthoff

Stephen M. Uthoff, Esq.
suthoff@uthofflaw.com
111 W. Ocean Blvd., Suite 1960
Long Beach, CA 90802
suthoff@uthofflaw.com
Counsel for Complainant

JEFFREY/FENNEMAN LAW +
STRATEGY, PLLC

Kaya Massey

Rebecca A. Fenneman, Esq.
Eric C. Jeffrey, Esq.
Kaya C. Massey, Esq.
RFenneman@JeffreyFenneman.com
EJeffrey@JeffreyFenneman.com
KMasse@JeffreyFenneman.com
700 12th Street, NW Suite 700
Washington, DC 20005
Counsel for Respondent