

**Before the
Federal Maritime Commission**

Docket No. 24-16

Samsung Electronics America, Inc. v. COSCO Shipping Lines Co. Ltd.

CONSENT MOTION FOR EXTENSION OF TIME

On March 28, 2024, Samsung Electronics America, Inc. (“Samsung” 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”) require that an Answer be filed no later than 25 days after service of the complaint, in this case, by April 22, 2024.

Counsel for Respondent, which has only recently been retained in this matter, is a small firm and one of its partners has a long-planned personal trip which will take him out of the country from April 16 to April 29, 2024, and thus requests additional time to prepare an initial responsive filing. The Parties have conferred and Complainant consents to the requested extension. Good cause exists to grant the requested extension, as such an extension will promote judicial efficiency by allowing Respondent’s counsel to seek more information and learn all the facts of this dispute, including the potential for possible settlement. Moreover, the Parties agree this will not cause undue delay or cause any disadvantage to either side.

Respondent accordingly requests that the deadline for the filing of the initial responsive pleading in this proceeding be extended until May 9, 2024.¹

¹ For context, please see the grant of an extension to May 13, 2024, in FMC 24-17, Samsung Electronics America, Inc. v. Orient Overseas Container Line Limited and OOCL (Europe) Limited.

DATED: April 5, 2024

Respectfully submitted,



Attorneys for Respondent

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Consent Motion for Extension of Time* was served on this date, April 5, 2024, upon the Federal Maritime Commission and upon the following via electronic mail.

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