

**Before the
Federal Maritime Commission**

Docket No. 24-17

**Samsung Electronics America, Inc. v. Orient Overseas Container Line, Limited
and OOCL (Europe) Ltd.**

CONSENT MOTION FOR EXTENSION OF TIME

On March 28, 2024 Samsung Electronics America, Inc. (“SEA” or “Complainant”) filed a Verified Complaint, alleging Respondents violated various provisions of the Shipping Act. The rules of the Federal Maritime Commission require that an Answer be filed no later than 25 days after service of the complaint, in this case, April 22, 2024.

Counsel for Respondent 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 this request for an extension. Good cause exists to grant the requested extension, and the Parties agree this will not cause undue delay or cause any disadvantage to either. The Parties therefore respectfully request that an Order be issued extending the deadline for the filing of the first responsive pleading in this proceeding until May 13, 2024.

DATED: April 3, 2024

Respectfully submitted,

s/ Rebecca A. Fenneman
Attorneys for Respondent
JEFFREY/FENNEMAN LAW + STRATEGY, PLLC
Eric C. Jeffrey
Ejeffrey@JeffreyFenneman.com
Rebecca A. Fenneman
RFenneman@JeffreyFenneman.com

CERTIFICATE OF SERVICE

I certify that on the 3rd day of April, 2024, a true and correct copy of the foregoing **CONSENT MOTION FOR EXTENSION OF TIME** was served by email on all counsel of record in accordance with 46 CFR Part 502 and the Commission's Order of May 12, 2020.

ATTORNEYS FOR COMPLAINANT:

Mills Black LLP
H. Allen Black
Peter Black
1215 19th Street, NW
Washington, DC 20036
+1 (202) 967-4100
hablack@millsblack.com
pblack@millsblack.com

/s/ Rebecca A. Fenneman

Rebecca A. Fenneman
RFenneman@JeffreyFenneman.com
Tel: (202) 904-2301
Jeffrey/Fenneman Law + Strategy, PLLC
700 12th Street, NW Suite 700
Washington, DC 20005