

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 25-29

MAC INDUSTRIES, INC.,

COMPLAINANT,

v.

COSCO SHIPPING LINES CO., LTD

COSCO SHIPPING LINES (NORTH AMERICA)

INC.,

RESPONDENTS.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO THE COMPLAINT**

In accordance with 46 C.F.R. §§ 502.69, 502.102 and as otherwise provided by law, Respondent COSCO Shipping Lines Co., Ltd., and COSCO Shipping Lines (North America) Inc. (CSLNA), collectively COSCO¹ respectfully request a 7-day extension to answer or otherwise respond to the Verified Complaint, as well as a reduction of Complainant's time to reply to two (2) days, showing the Commission as follows:

1. Complainant MAC Industries, Inc., filed this action on December 18, 2025. On December 22, 2025, the Notice of Filing of Complaint was served. The present deadline to answer

¹ CSLNA is not a common carrier and so is not subject to the jurisdiction of the FMC. This firm will represent them until they are dismissed.

or otherwise respond to the Verified Complaint is January 16, 2026, *i.e.*, 25 days of December 22, 2025—the date of service stamped on the Verified Complaint.

2. COSCO. retained the undersigned counsel late in the day on January 12, 2026, to represent their interests in this action.

3. On January 13, 2026, Respondents, by and through their undersigned counsel and in accordance with 46 C.F.R. § 502.71(a), conferred with counsel for Complainant about the extension on January 13, 2025, but counsel for Complainant abruptly stated that Complainant “does not consent to an extension.”

4. “Motions for enlargement or reduction of time for the filing of any pleading or other document, or in connection with the procedures of subpart L of this part, may be granted upon a showing of good cause. Motions must set forth the reasons for the request and be received at least seven (7) days before the scheduled filing date. Motions filed less than seven (7) days before the scheduled filing date may be considered where reasonable grounds are found for the failure to meet this requirement.” 46 C.F.R. § 502.102(a).

5. Good cause exists for a 7-day extension because: (1) Respondents’ counsel were just retained in this action on January 12, 2026 — four days before the deadline to answer or otherwise respond (2) Respondent’s counsel needs time to investigate and research the claims asserted in the Complaint; and (3) Respondent’s custodians of documents and people with the most knowledge of the events giving rise to this action are overseas and have limited availability to assist in the preparation of an answer or response to the Complaint.

6. On top of the foregoing, one of the firm’s two partners has very limited time because their spouse is currently undergoing treatment for a serious illness.

7. Reasonable grounds exist for not filing this motion at least 7 days before the

deadline to answer or respond to the Verified Complaint because Respondents' undersigned counsel was retained just days before the deadline.

8. A 7-day extension will not adversely impact this proceeding.

9. Respondents also request that Complainant's time to reply be shortened to two (2) days, as the normal date for responding would be well past the deadline as to which relief is sought.

10. This motion is not interposed for delay.

Respondents, therefore, respectfully request a 7-day extension (up to and through **Friday, January 23, 2026**) to answer or otherwise respond to the Verified Complaint and any additional relief the Presiding Officer believes is just and proper.

Dated: January 13, 2026



Kaya C. Massey

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Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on this 13th of January, 2026, a true and correct copy of this document was served upon the following by e-mail:

Brad Heier
MAC Industries, Inc.
brad@maccontainer.com

Representative for Complainant

/s/ Kaya C. Massey

Kaya Massey