

**NIXON
PEABODY**

NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Eric C Jeffrey
Counsel
ejeffrey@nixonpeabody.com

Nixon Peabody LLP
401 9th Street NW
Suite 900
Washington, DC 20004-2128
202-585-8000

June 6, 2014

VIA FEDERAL EXPRESS

The Hon. Karen V. Gregory
Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D.C. 20573

Re: Edaf Antillas, Inc. v. Crowley Caribbean Logistics, LLC; IFS International Forwarding,
S.L.; and IFS Neutral Maritime Services, Docket No. 14-04

Dear Ms. Gregory:

Enclosed for filing are an original true copy and five (5) additional copies of the Consent
Motion of Respondent Crowley Caribbean Logistics, LLC for Extension of Time.

Please contact me if you have any questions.

Sincerely,

Eric C. Jeffrey
Counsel for Crowley Caribbean Logistics, LLC

Lindsey M. Nelson
Counsel for Crowley Caribbean Logistics, LLC

Enclosure

FEDERAL MARITIME COMMISSION

DOCKET NO. 14-04

EDAF ANTILLAS, INC.

v.

**CROWLEY CARIBBEAN LOGISTICS, LLC;
IFS INTERNATIONAL FORWARDING, S.L.; and
IFS NEUTRAL MARITIME SERVICES**

CONSENT MOTION OF RESPONDENT CCL FOR EXTENSION OF TIME

On June 2, 2014, the Chief Administrative Law Judge granted a joint motion of Respondents IFS International Forwarding, S.L. and IFS Neutral Maritime Services (collectively “IFS”) for an extension of time to answer the Complaint. Order Enlarging Time To Answer Or Otherwise Respond (“Order”) (June 2, 2014). Unfortunately, the dates requested by IFS and granted by the Presiding Judge conflict with obligations of counsel for Respondent Crowley Caribbean Logistics, LLC (“CCL”), who had already finalized arrangements to be overseas in light of the schedule as it existed prior to the motion.

Counsel for CCL has consulted with counsel for Complainant Edaf Antillas, Inc. (“Edaf”), and counsel for IFS. The Parties have agreed to extend the date for filing the Joint Status Report and for the preliminary conference with CADRS until August 15, 2015, which will accommodate the schedules of counsel for all Parties. The Parties will, if feasible, schedule the preliminary conference with CADRS earlier.

As more detailed grounds for this motion, CCL states as follows:

1. On May 27, 2014, CCL filed its Answer in this proceeding. At that time, there were no motions pending.
2. Based on the schedule as it existed as of the due date of May 27, and prior to the filing of the IFS motion for an extension of time, counsel for CCL finalized plans that will require him to be out of the country every business day save one between June 25, 2014 and July 21, 2014.
3. IFS was unable to consult with counsel for CCL prior to filing its motion, and so these scheduling issues could not be addressed in connection with the IFS motion.
4. As stated above, counsel for CCL discussed this motion with counsel for Edaf and counsel for IFS, each of whom consents to the requested extension.

For the foregoing reasons, CCL requests that the date for the Joint Status Report and preliminary conference with CADRS be extended until August 15, 2014.

Dated: June 6, 2014

Respectfully submitted,

BY: 

ERIC JEFFREY

LINDSEY M. NELSON

NIXON PEABODY LLP

401 Ninth Street, NW, Suite 900

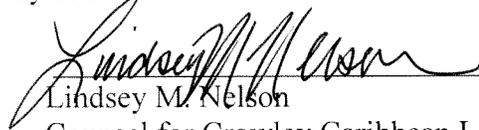
Washington, DC 20004

(202) 585-8000

Certificate of Service

I hereby certify that I have this day served the foregoing document upon counsel for all parties of record by mailing a copy to each person.

Dated at Washington, DC, this 6th day of June 2014.


Lindsey M. Nelson
Counsel for Crowley Caribbean Logistics, LLC