

Federal Maritime Commission
Washington, D.C.

Edaf Antillas, Inc.,

Docket No. 14-04

Complainant

v.

Crowley Caribbean Logistics, LLC,
IFS International Forwarding, S.L.
and IFS Neutral Maritime Services,

Respondents.

**IFS INTERNATIONAL FREIGHT FORWARDING, S.L.'s AND
IFS NEUTRAL MARITIME SERVICE'S MOTION TO ENLARGE TIME TO
ANSWER OR OTHERWISE MOVE WITH REGARDS TO THE COMPLAINT**

Respondents IFS International Forwarding, S.L. and IFS Neutral Maritime Services (collectively, "IFS"), by and through their attorneys, Betancourt, Van Hemmen, Greco & Kenyon LLC, hereby moves the Federal Maritime Commission ("Commission") for an Order pursuant to Rule 62 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.62(b)(1), to enlarge IFS's time to answer or otherwise move with regards to the Complaint by thirty (30) days. Counsel for plaintiff Edaf Antillas, Inc. does not oppose this request.

In this instance, the date of service was apparently May 2, 2014.¹ An answer to a

¹We reserve the right to contest the validity of service.

complaint is due twenty-five days after the date of service as per Rule 62, 46 C.F.R. § 502.62(b)(1). The apparent filing deadline for the answer in this instance was therefore May 27, 2014.

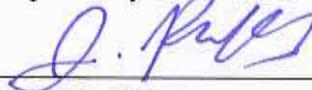
IFS is a maritime services company primarily based in Valencia, Spain. This Firm was retained to represent IFS in this matter on May 29, 2014. It was therefore impossible for counsel to file an answer or otherwise move on behalf of IFS until after the May 27 date had passed. Rule 62, 46 C.F.R. § 502.62(b)(1), permits filing an answer out of time “[f]or good cause shown.” As this Firm was not retained in this matter until after the May 27 deadline had passed, good cause exists for IFS’s failure to file by May 27, and this Motion for an Enlargement of Time should be granted.

Additionally, on the morning of May 29, 2014, within a few hours of being retained by IFS, the undersigned spoke by telephone with counsel for Edaf Antillas, Inc. Counsel stated that he would not object to any request made by IFS for an enlargement of time to answer or otherwise move with regards to the Complaint, which position was confirmed via e-mail. Accordingly, the duty to confer promulgated in Rule 71, 46 C.F.R. § 502.71(a), has been satisfied.

In order to review the Complaint and consult with IFS in order to ensure a full and fair consideration of the issues raised therein, an enlargement of time is necessary. Due to this Firm’s late involvement in this matter, no earlier opportunity existed to make this

motion. Additionally, the partner in charge of this matter, Jeanne-Marie Van Hemmen, is out of the office on a family emergency, accordingly an enlargement of time is needed to permit this Firm an opportunity to consult with its Spanish client. Accordingly, good cause exists for both the failure to file an answer or otherwise move by May 27, 2014 and for an enlargement of time, and IFS respectfully requests that the Commission allow it a 30-day extension from the date of this filing, until June 29, 2014, to answer or otherwise move with regards to the Complaint.

Respectfully Submitted,



Joshua S. Parks

Betancourt, Van Hemmen, Greco & Kenyon LLC
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Red Bank, NJ 07701
Tel.: 732-530-4646
Fax: 732-530-9536
email: jparks@bvgklaw.com

Dated: May 30, 2014

CERTIFICATE OF SERVICE

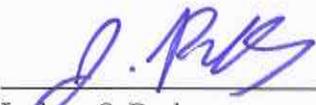
I hereby certify that I have this day served the foregoing document upon the following addressee by depositing same in the United States Mail, first class postage prepaid, and be e-mail:

Carlos E. Matos Malec, Esq.
Edaf Antillas, Inc.
P.O. Box 11249
San Juan, PR 00922-1249
(787) 707-1792
carlos@forsapr.com

I hereby certify that I have this day served the foregoing document upon the following addressee by depositing same in the United States Mail, first class postage prepaid:

Crowley Caribbean Logistics, LLC
P.O. Box 70208
San Juan, PR 00936-8208

Dated: May 30, 2014



Joshua S. Parks