

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14-10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

v.

AMOY INTERNATIONAL, LLC.

RESPONDENT

JOINT STATUS REPORT

Complainant, Econocaribe Consolidators, Inc. (“Econocaribe”) and Respondent, Amoy International, LLC (“Amoy”) (jointly referred to as the “Parties”), through counsel, submit this Joint Status Report pursuant to FMC Rule 201(e).

Since the filing of the First Joint Status Report on September 30, 2014, parties have exchanged the first round of discovery requests and responses thereto.

On November 3, 2014, parties met and conferred telephonically with FMC's mediator with respect to mediation. Parties agreed that each had pending discovery requests which should be produced prior to mediation.

On November 3, 2014, Amoy served Econocaribe its first set of interrogatories. Econocaribe intends to serve the answer on or before December 3, 2014.

On November 13, 2014, Econocaribe served Amoy a letter requesting Amoy to supplement its document production, especially requesting Amoy to produce correspondence showing Amoy's endeavors to obtain the shipper's assistance in returning the container; and Krystal Lee's personnel file.

On November 17, 2014, parties met and conferred telephonically with respect to the following issues: 1) whether to mediate; 2) date for mediation and 3) where mediation could take place. On November 19, 2014 the agency circulated an email questionnaire seeking input as to mediation style, and Plaintiff responded on Nov. 20, 2014.

PROPOSED SCHEDULE

The parties have agreed to adhere to the following proposed schedule:

1. The Complainant has identified 46 U.S.C. §41104(2)(A), 46 U.S.C. §41102(c) and 46 C.F.R. §SIS.31(e), and of the Shipping Act of 1984 as amended, sections 10 (a)(1), (b)(I), (b)(2)(A) & (B) as the basis for the Court's jurisdiction.
2. Parties have tentatively agreed to mediate but date and place are still unknown.
3. Motions to join other parties, to amend the pleadings, or other preliminary matters shall be submitted by January 1, 2015.
4. The identity of expert witnesses, if any, shall be disclosed and their reports shall be served by January 1, 2015.
5. Discovery shall be completed by February 1, 2015.
6. Any remaining motions regarding discovery shall be submitted March 1, 2015.
7. Dispositive motions, if any, and requests for trial shall be filed no later than April 1, 2015. Either party may file a dispositive motion, and the rules of this Court

shall govern responses thereto, which may include a cross-motion for summary judgment.

8. Econocaribe estimates that the dollar amount in controversy is approximately \$110,000.00 to upwards of approximately \$192,811.00, with interest and attorney's fees.
9. If necessary, a pretrial conference shall be held on May 1, 2015.

The above proposed schedule is presented with the mutual understanding that it may require leave to amend.

Dated: December 2, 2014

Respectfully submitted,

THE MOONEY LAW FIRM, LLC



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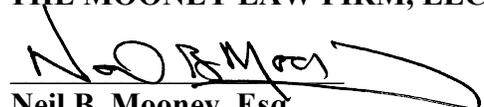
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CERTIFICATE OF SERVICE

A true a correct copy of the foregoing has been served upon the persons listed below in the matter indicated on this 2nd day of December 2014.

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