

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14 -10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

V.

AMOY INTERNATIONAL, LLC.

RESPONDENT

**MOTION TO EXTEND TIME TO OPPOSE COMPLAINANT'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Respondent, Amoy International, LLC., seeks an order extending the time to oppose Complainant Econocaribe Consolidators, Inc.'s Motion for Partial Summary Judgment to Monday, January 26, 2015.

The reason for the request is that a mediation in this matter is scheduled

for January 8, 2015. An Opposition to the Motion for Partial Summary Judgment is due on January 6, 2015. It would appear that the best use of respondent counsel's time would be to focus on the mediation, since, if successful, an opposition to the motion would not be necessary. The undersigned has spoken with counsel for Econocaribe, Neil B. Mooney, Esq., and he has agreed to this request.

Dated: December 31, 2014

Respectfully submitted,
RUSSELL, MIRKOVICH & MORROW



Joseph N. Mirkovich, Esq.
RUSSELL MIRKOVICH & MORROW
One World Trade Center, Suite 1660
Long Beach, California, 90831-1660
Telephone: (562) 436-9911
Fax: (562) 436-1897
Email: jmirkovich@rumlaw.com

Attorneys for Respondent
AMOY INTERNATIONAL LLC.

IT IS SO ORDERED

Dated: _____, 2015

Erin M. Wirth
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the original and appropriate number of copies of the foregoing **Motion to Extend Time to Oppose Complainant's Motion for Partial Summary Judgment** were sent by overnight mail to the Commission on December 31, 2014 and that a copy was also emailed to the Commission on that date.

I certify that a true and correct copy of the foregoing **Motion to Extend Time to Oppose Complainant's Motion for Partial Summary Judgment** was served on the below-mentioned counsel via U.S. Mail and Email on December 31, 2014.

Karen V. Gregory, Secretary
FEDERAL MARITIME COMMISSION
Office of the Secretary
800 North Capitol Street, N.W.
Washington, DC 20573-0001
Telephone: (202) 523-5725
Fax: (202) 523-0014
Email: secretary@fmc.gov

Neil B. Mooney, Esq.
THE MOONEY LAW FIRM, LLC
1911 Capital Circle, N.E.
Tallahassee, FL 32308
Telephone: (850) 893-0670
Fax: (850) 391-4228
Email: nmooney@customscourt.com

Attorneys for Complainant
ECONOCARIBE
CONSOLIDATORS, INC.



Joseph N. Mirkovich