

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14 -10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

V.

AMOY INTERNATIONAL, LLC.

RESPONDENT

**RESPONDENT'S OBJECTION TO EXHIBIT I TO COMPLAINANT'S
MOTION TO COMPEL**

Respondent Amoy International LLC objects to the admissibility of Exhibit I to Complainant's Motin to Compel based upon a lack of foundation/authentication F.R.E. Rule 901, hearsay F.R.E. Rules 801, 802; no Request for Judicial Notice was made.

Exhibit I to Complainant's Motion to Compel consist of a number of website printouts. It contains references to multiple entities other than Respondent Amoy. For example, it includes companies like Hawaii Gas and ABASCO LLC of Humble TX., which have no relevance to Amoy, suggesting that Exhibit 2 was created by TradeKey.com.

"... any evidence procured off the Internet is adequate for almost nothing even under the most liberal interpretation of the hearsay exception rules found in FED.R.CIV.P. 807." St. Clair v. Johnny's Oyster & Shrimp, Inc., 76 F. Supp 2d 773,775 (S.D. Tex, 1999).

Respectfully submitted,

Dated: February 17, 2015

RUSSELL, MIRKOVICH & MORROW

By:



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AMOY INTERNATIONAL LLC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **RESPONDENT'S**
OBJECTION TO EXHIBIT I TO COMPLAINANT'S MOTION TO
COMPEL, was sent to the below-mentioned counsel via email on February 17,
2015.

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