

**BEFORE THE
FEDERAL MARITIME COMMISSION**

Petition of LCL Logistix (India) Pvt. Ltd. dba LCL Lines (“LCL”) for a Declaratory Order
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Docket No. 14-11

LCL’s MOTION FOR LEAVE TO FILE RESPONSE TO MSC REPLY

The Mediterranean Shipping Company SA (“MSC”) has submitted a response to the Petition of LCL Logistics (India) Pvt. LTD dba LCL Lines for a Declaratory Order. LCL hereby moves to file the attached reply. As LCL made clear in the Petition, its purpose is to enable the Commission to provide guidance to the United States District Court on issues of the reasonableness of MSC’s practices that are “appropriately brought before the Commission.” *Cargo One, Inc. v. COSCO Container Lines Co., Ltd.*, 28 S.R.R. 1635, 1645 (2000). As reflected therein, although LCL believes that a Petition is the appropriate vehicle for obtaining the Commission’s views on whether a carrier can engage in the demurrage practices pursued by MSC in this case, the more important consideration is that the Commission be afforded the opportunity to address an issue which is of significant importance to shippers, NVOCCs and steamship lines and provide direction that will guide their future actions. Accordingly, LCL requests that it be permitted the opportunity to file the attached reply to MSC’s filing.¹

¹ MSC and LCL have conferred, pursuant to Rule 71 of the Commission’s Rules of Practice and Procedure, 46 C.F.R. § 502.71, and MSC does not consent to the motion.

Respectfully submitted,

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DATED: September 19, 2014

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was delivered to the following addressees at the addresses stated by depositing same in the United State mail, first class postage prepaid, and/or by electronic transmission, this 19th day of September 2014:

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