

“The moving party may not file a reply to a response to a non-dispositive motion unless requested by the Commission or presiding officer, or upon a showing of extraordinary circumstances.” 46 CFR 502/71 (c) (Rule 71)

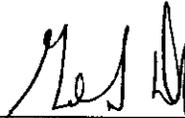
Complainant claims that it has “business records” and “shipping documents”, but they are “sensitive and confidential”. Complainant has not offered or explained any “extraordinary circumstances”.

As Complainant instigated this action, it must live with the consequences of the information or evidence it would like to divulge, and that which it would rather not divulge.

As Complainant fails to show “extraordinary circumstances”, but only litigation tactics that it used in making its initial motion, the Motion should be denied.

Respectfully submitted,

By:



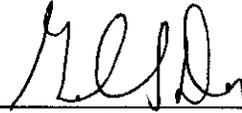
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Michael Khitrinov, and
Empire United Lines, Co., Inc.

Dated in Short Hills, NJ twenty first day of May 2015.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the RESPONDENTS' MEMORANDUM IN OPPOSITION TO COMPLAINANT'S REQUESTING PERMISSION TO FILE A REPLY BRIEF FOR COMPLAINANT'S MOTION FOR RECONSIDERATION, ETC. upon Complainant's

counsel, Marcus A. Nussbaum, Esq., with the address of P.O. Box 245599, Brooklyn, NY 11224 by first class mail, postage prepaid and by email (marcus.nussbaum@gmail.com); and that the original and five (5) copies are being filed with the Secretary of the Federal Maritime Commission.



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