

**BEFORE THE
FEDERAL MARITIME COMMISSION**

-----)
BALTIC AUTO SHIPPING, INC.)

COMPLAINANT,)

v.)

) DOCKET NO. 14-16

MICHAEL HITRINOV a/k/a)
MICHAEL KHITRINOV,)
EMPITER UNITED LINES CO., INC.,)

RESPONDENTS.)
-----)

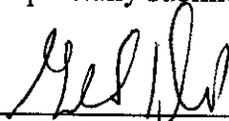
ATTACHMENT TO

**RESPONDENTS' MOTION REQUESTING A DISCOVERY DISPUTE CONFERENCE
AND FOR AN EXTENSION OF TIME TO FILE MOTION FOR PARTIAL SUMMARY
DECISION**

The attachment referred to in the captioned motion on page 3 ("Conclusion") is attached hereto, and should be filed with the Motion itself.

Respectfully submitted,

By:



Gerard S. Doyle, Jr.

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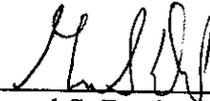
Michael Khitrinov, and

Empire United Lines, Co., Inc.

Dated in Short Hills, NJ this eleventh day of March 2015.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the **ATTACHMENT TO RESPONDENTS' MOTION REQUESTING A DISCOVERY DISPUTE CONFERENCE AND FOR AN EXTENSION OF TIME TO FILE MOTION FOR PARTIAL SUMMARY DECISION** 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 fax (347-572-0439), and by email (marcus.nussbaum@gmail.com).



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Dated in Short Hills, NJ this eleventh day of March 2015

RESPONDENTS' REQUEST OF COMPLAINTANTS

Doyle (Respondents' attorney) to Nussbaum (Complainant's attorney)

In my email to you on Friday, February 27, 2015 (3:31 PM) I requested the following:

"In the course of collecting the information requested in your Feb. 9, 2015 letter (the four items for each of the shipments listed in your Exhibits A-E; now reduced to Exhibits C-E) Respondents realize that there is information in Complainant's possession that we will need for our motion.

Specifically, for the shipments/containers identified in Exhibits A-E, please provide by next Friday (March 6, 2015):

1. E-mails from Empire United Lines, Co., Inc. ("EUL") containing the confirmation of Baltic Auto Shipping, Inc.'s ("Baltic") booking with EUL;
2. The Baltic emails to EUL containing the shipping instructions for each shipment (with the instructions themselves);
3. Proof of payment for the shipments (showing date of payment);
4. E-mails from EUL with the Release for each container."

Question: Do you anticipate any problem responding to Respondents' document request, or providing the audit (as instructed by ALJ Guthridge) by Friday, March 6, 2015?