

**BEFORE THE
FEDERAL MARITIME COMMISSION**

Docket No.: 14-16

BALTIC AUTO SHIPPING, INC.,

Complainant,

– vs. –

**MICHAEL HITRINOV
a/k/a MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC.,**

Respondents.

COMPLAINANTS' MOTION FOR CONFIDENTIAL TREATMENT

Complainant, Baltic Auto Shipping, Inc. ("Baltic"), by and through its attorney, Marcus A. Nussbaum, Esq., hereby moves for an Order, pursuant to Rule 201 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.201 for confidential treatment of The Complainants' Reply On Their Motion To Withdraw Appeal And Discontinue Action and Appendix thereto.

**COMPLAINANTS HAVE DEMONSTRATED GOOD CAUSE FOR THE
CONFIDENTIAL TREATMENT OF THE REPLY AND APPENDIX THERETO**

It is respectfully submitted that complainant has demonstrated the requisite good cause necessary to justify confidential treatment of the Complainants' Reply on Their Motion to Withdraw Appeal and Discontinue Action and Appendix thereto, in that the Settlement Agreement which is the subject of the Reply has a confidentiality clause that prohibits the disclosure of same to the public. In order to abide with the obligations of the parties herein arising out of said confidentiality clause, complainant has redacted from the public version of its Reply brief the citations to specific language in the Settlement Agreement. Additionally, complainant has omitted

the Settlement Agreement from the public version of the Appendix to said Reply, together with the Transcript of Proceedings of April 21, 2016, which makes reference to various terms of said settlement.

WHEREFORE, based upon the foregoing, it is respectfully requested that the Presiding Officer deem confidential the Complainants' Reply On Their Motion To Withdraw Appeal And Discontinue Action and Appendix thereto, together with such other and further relief as may be just and proper under the circumstances.

Dated: September 2, 2016
Brooklyn, New York

Respectfully Submitted,



Marcus A. Nussbaum, Esq.
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Attorney for Complainant

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the within **COMPLAINANTS' MOTION FOR CONFIDENTIAL TREATMENT** upon Respondents' Counsel, The Law Office of Doyle & Doyle, with the address of 636 Morris Turnpike, Short Hills, NJ 07078 by first class mail, postage prepaid, and by email (gdoyle@doyelaw.net).



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Dated: September 2, 2016
Brooklyn, New York