

**BEFORE THE
FEDERAL MARITIME COMMISSION**

BALTIC AUTO SHIPPING, INC.)	
)	
)	
COMPLAINANT,)	
)	
v.)	
)	DOCKET NO. 14-16
)	
MICHAEL HITRINOV a/k/a)	
MICHAEL KHITRINOV,)	
EMPIRE UNITED LINES CO., INC.,)	
)	
RESPONDENTS.)	
)	

**RESPONDENTS' MOTION FOR A CONFERENCE TO ESTABLISH AND AMEND
THE SCHEDULE FOR THE BRIEFING OF MATTERS BEFORE THE COMMISSION**

Respondents herewith file and serve their Motion for a conference to establish and amend the schedule for the briefing of matters before the Commission.

On April 27, 2015 Complainant filed a Motion for Leave to Amend the Amended Complaint by adding two parties and new claims that do not involve the shipments which are the subject of the Amended Complaint - which shipments have been the focus of the instant matter since November 2014.

On April 28 the Commission held a telephone conference which addressed the briefing schedule for the Complainant's Reply (and the Respondents' Response) to the Respondents' Motion for Partial Summary Decision.

The Commission granted the Complainants additional time to reply, and shortened the time for the Respondents' response.

In reaction to the Motion for Leave to Amend the Amended Complaint, on April 29 the parties whom the Complainant sought to add to this matter, an attorney and the attorney's law firm, filed a Motion to intervene to address the Complainant's Motion for Leave to Amend the Amended Complaint

On April 30 the Claimants filed another Motion, this time requesting Reconsideration of a finding made by the ALJ on April 1.

In response to this flurry of motions, on May 1 Respondents' counsel requested the consent of the Claimant's counsel to fix an orderly briefing schedule by expanding the time to respond to the Motions to Amend, Intervene and Reconsider, along with an extension of time to reply to the Complainant's response to the Respondents Motion for Partial Summary Decision.

Complainant refused to consent to an extension of time to respond to the Motions for Leave to Amend and for Reconsideration, but did consent to an extension of time for the Respondents' response to the Complainant's reply to the Respondents' Motion to May 26.

On May 1 Respondent's then applied by Motion to the Commission to amend the Briefing Schedule as Respondents' had proposed to the Claimant.

The Commission did not address the Motion to Amend the Schedule and Respondents' were obligated to file their opposition to the Motion to Amend on May 4, albeit under the circumstances, without adequate time to make such a response.

The Commission has not yet responded to the Motion to Amend the Briefing Schedule, and the time for response to the Complainant's Motion for Reconsideration expires on Friday, May 8.

Respondents herewith seek a clarification of the briefing schedule and request a confer-

ence to establish an orderly schedule for briefing the multiple matters now before the Commission.

Respectfully submitted,

By:

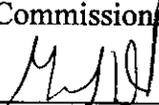


Gerard S. Doyle, Jr.
THE LAW OFFICE OF DOYLE & DOYLE
636 Morris Turnpike
Short Hills, NJ 07078
973-467-4433 (Telephone)
973-467-1199 (Facsimile)
gdoyle@doylelaw.net
Attorneys for Respondents
Michael Hitrinov, a/k/a
Michael Khitrinov, and
Empire United Lines, Co., Inc.

Dated in Short Hills, NJ the sixth day of May 2015.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the RESPONDENTS' MOTION FOR A CONFERENCE TO ESTABLISH AND AMEND THE SCHEDULE FOR THE BRIEFING OF MATTERS BEFORE THE COMMISSION 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



Gerard S. Doyle, Jr.
THE LAW OFFICE OF DOYLE & DOYLE
636 Morris Turnpike
Short Hills, NJ 07078
973-467-4433 (Telephone)
973-467-1199 (Facsimile)
gdoyle@doylelaw.net
Attorneys for Respondents
Michael Hitrinov, a/k/a
Michael Khitrinov, and
Empire United Lines, Co., Inc.

Dated in Short Hills, NJ. this sixth day of May, 2015.