

*Before the Federal Maritime Commission*

COMBUSTION STORE LIMITED,	§	
	§	
Complainant,	§	
	§	Docket No. 15-02
v.	§	
	§	
UNIGROUP WORLDWIDE - UTS,	§	
	§	
Respondent.	§	

**COMPLAINANT’S CONSENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO RESPONDENT’S MOTION TO DISMISS**

Pursuant to Rules 69 and 102 of the Commission's Rules of Practice and Procedure, 46 C.F.R. §§ 502.69, 502.102, Complainant, Combustion Store Limited (“Combustion”), by and through undersigned counsel, respectfully requests the grant of an additional ten (10) days, to and including July 17, 2015, within which to respond to Respondent’s Motion to Dismiss, and in support states as follows:

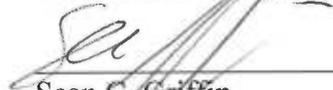
1. That Combustion’s response to UniGroup’s Motion to Dismiss is currently due on July 6, 2015.
2. Previously, Respondent requested and was granted a 21-day extension of time within which to respond to Combustion’s Complaint, with Combustion’s consent.
3. Undersigned counsel requires additional time to address the arguments the Motion to Dismiss raises and to prepare its opposition to Respondent’s Motion to Dismiss.
4. Undersigned counsel has conferred with counsel for Respondent, UniGroup Worldwide – UTS (“UniGroup”). UniGroup's counsel have authorized Combustion to state that they do not object to the requested extension.

Counsel for Combustion therefore respectfully moves the presiding Administrative Law

Judge to grant an additional ten (10) days up to and including Friday, July 17, 2015, in which to respond to Respondent's Motion to Dismiss. The grant of such an extension under these circumstances is consistent with prior Commission precedent and procedures and will promote the administration of justice and the efficient disposition of this case. *See Great White Fleet, Ltd. V. Southeastern Paper Prods. Export, Inc.*, 26 SRR 1374 [ALJ, 1994]; *Puerto Rico Freight Sys., Inc. v. R & S Trading and J.C. Trading*, 27 SRR 141 [ALJ, 1995].

Respectfully submitted,

**GARVEY SCHUBERT BARER**



Sean C. Griffin  
sgriffin@gsblaw.com  
1000 Potomac Street, N.W., Fifth Floor  
Washington, DC 20007  
Tel: (202) 965-7880  
Fax: (202) 965-1729

*Attorney for Complainant  
Combustion Store Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 6<sup>th</sup> day of July served the foregoing document upon counsel for Respondent (C. Jonathan Benner, Warren L. Dean, Deona R. DeClue, Scott McMickle, Chandler L. Smith) via electronic mail and by mailing a copy via the US Postal Service.

  
Sean C. Griffin

GSB:7169462.1