

**BEFORE THE
FEDERAL MARITIME COMMISSION**

COMBUSTION STORE LIMITED,)	
)	
Complainant,)	
)	
v.)	Docket No. 15-02
)	
UNIGROUP WORLDWIDE, INC.,)	
)	
Respondent.)	
_____)	

PROPOSED JOINT DISCOVERY PLAN UNDER 46 CFR § 502.201(h)

The parties, through counsel, submit the following proposed discovery plan under Commission Rule 201(h).

I. Discovery Deadlines

The parties agree that fact discovery in this matter must, pursuant to Commission Rule 201(g), be completed on or before March 17, 2016.

II. Initial Disclosures

The parties exchanged initial disclosures on October 26, 2015. Consistent with Commission Rule 201(k), counsel agree to amend or supplement their initial disclosures as needed.

III. Dispositive Motion Deadline

The parties agree that dispositive motions must be filed on or before June 23, 2016.

IV. Expert Disclosure Deadline

Complainant will make its expert disclosure on or before April 18, 2016, and Respondent will make its expert disclosure on or before May 18, 2016. By agreement of the parties, any expert-related discovery must be completed on or before June 1, 2016.

V. Discovery Subjects

Counsel agree that discovery in this matter can be focused on a relatively narrow set of factual issues, and that consistent with Commission Rule 201(h), they will work closely to expedite and limit the scope of discovery by use of admissions, stipulations and other techniques. Unless otherwise stipulated by the parties or ordered by the presiding Administrative Law Judge, discovery will proceed in accordance with the Rules of Practice and Procedure of the Commission, and, unless conflicting with those rules, the Federal Rules of Civil Procedure.

Respectfully submitted, this 6th day of November 2015, by:


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