

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 15-04

CROCUS INVESTMENTS, LLC AND CROCUS, FZE,

– vs. –

**MARINE TRANSPORT LOGISTICS, INC. AND ALEKSANDR SOLOVYEV
a/k/a ROYAL FINANCE GROUP INC.**

**COMPLAINANTS' MOTION TO ENLARGE TIME FOR FILING EXCEPTIONS TO
THE PRESIDING OFFICER'S INITIAL DECISION**

Complainants CROCUS INVESTMENTS, LLC and CROCUS, FZE ("Complainants"), by and through their attorney Marcus A. Nussbaum, Esq., hereby move for an Order pursuant to Rule 228 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.228, to enlarge Complainants' time for filing the Exceptions to the Presiding Officer's Initial Decision, up to and including February 12, 2017. On September 5, 2016, counsel for Complainants attempted to consult with counsel for respondents regarding this motion. Assumedly due to the long holiday weekend, the undersigned was unable to reach counsel for respondents. Good cause exists to grant this Motion for reasons that follow:

1. On June 17, 2016, the Presiding Officer issued the Initial Decision in this matter (the "Initial Decision") and dismissed the Complaint. Pursuant to Rule 227 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.227, Complainants were to file their Exceptions to the Initial Decision with the Commission "within twenty-two (22) days after the date of service of [the Initial Decision]."

2. On June 29, 2016, Complainants' former counsel of record filed a motion to enlarge

the time for filing exceptions to the Initial Decision and then subsequently moved to withdraw as counsel on the same date. The motion for enlargement of time was granted by the Commission on July 6, 2016. The Order granting complainants' former counsel leave to withdraw was then granted on July 14, 2016.

3. Presently, Complainants must file their Exceptions to the Initial Decision with the Commission by September 12, 2016.

4. Complainants now seek an extension of time, up to and including February 12, 2017, to file their Exceptions.

5. Rule 228 of the Commission's Rules of Practice and Procedure, 46 C.F.R. § 502.228, permits a party to file a motion seeking an enlargement of time for filing of Exceptions. Such motions must set forth their reasons and be submitted at least seven (7) days before the scheduling date for filing. 46 C.F.R. § 502.228.

6. Complainants' Motion is timely submitted. Complainants' Exceptions to the Initial Decision are not due until September 12, 2016. Complainants file this Motion on September 5, 2016, more than seven days before the date on which currently they must file Exceptions.

7. Good cause exists for enlarging Complainants' time for filing Exceptions. The undersigned was recently retained by complainants for the purpose of filing the exceptions in this matter, which will require the review and analysis of hundreds pages of documents, most of which are other than in English. In light of the voluminous file in this matter, it will take time to carefully review the entire file in preparation for the drafting and filing of the exceptions.

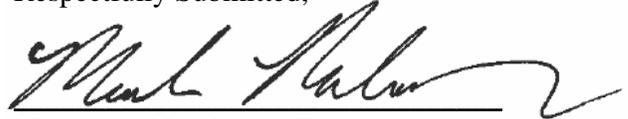
8. In light of the foregoing, it is respectfully submitted that an extension of time is necessary.

WHEREFORE, Complainants respectfully request that the Commission allow an extension, up

to and including February 12, 2017, to file their Exceptions to the Initial Decision.

Dated: September 5, 2016
Brooklyn, NY

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Marcus A. Nussbaum", written over a horizontal line.

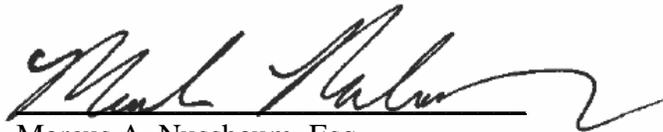
Marcus A. Nussbaum, Esq.
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Tel: 888-426-4370
Attorney for Complainants

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the **COMPLAINANTS' MOTION TO ENLARGE TIME FOR FILING EXCEPTIONS TO THE PRESIDING OFFICER'S INITIAL DECISION** upon Respondents' Counsel at the following address:

Montgomery, McCracken, Walker & Rhoads, LLP
437 Madison Ave., 29th Floor
New York, NY 10022
Attn: Stephen H. Vengrow, Esq.
Attn: Eric Chang, Esq.

by first class mail, postage prepaid, and by email (echang@mmwr.com and svengrow@mmwr.com).



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Dated: September 5, 2016 in Brooklyn, New York.