

BEFORE THE  
FEDERAL MARITIME COMMISSION

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Docket No. 15-08

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OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMMISSION

GENERAL MOTORS LLC

*Complainant,*

v.

NIPPON YUSEN KABUSHIKI KAISHA;  
WALLENIUS WILHELMSSEN LOGISTICS AS; and  
EUKOR CAR CARRIERS INC.

*Respondent.*

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**JOINT MOTION TO SEAL CONFIDENTIAL SETTLEMENT AGREEMENT**

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Pursuant to Federal Maritime Commission Rule of Practice and Procedure 5, 46 C.F.R. § 502.5, Complainant General Motors LLC (“GM”) and specially appearing Respondent Nippon Yusen Kabushiki Kaisha (collectively, GM and NYK are the “Settling Parties”) jointly move to seal the entirety of **CONFIDENTIAL EXHIBIT A** to the Settling Parties’ Joint Motion and Memorandum for Approval of Settlement Agreement, Dismissal With Prejudice of the Complaint Against Nippon Yusen Kabushiki Kaisha, and Treatment of Settlement Agreement as Confidential, dated September 7, 2016. **CONFIDENTIAL EXHIBIT A** to that motion is a copy of the Settlement Agreement (the “Settlement Agreement”) between the Settling Parties.

The entire contents of the Settlement Agreement are of a sensitive and confidential nature, and strict confidentiality was a material and necessary element of the Settlement Agreement. The entire Settlement Agreement could therefore be compromised by a breach of

confidentiality. For these reasons, and for those set forth in the Settling Parties' Joint Motion and Memorandum for Approval of Settlement Agreement, Dismissal With Prejudice of the Complaint Against Nippon Yusen Kabushiki Kaisha, and Treatment of Settlement Agreement as Confidential, the Settling Parties move to seal the Settlement Agreement in its entirety.

Dated: September 12, 2016

Respectfully submitted,



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*Counsel for Specially Appearing Respondent  
Nippon Yusen Kabushiki Kaisha*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all parties of record by electronic mail, and submitted a copy via U.S. mail to each such person.

DATED: September 12, 2016



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