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June 13, 2016

VIA FIRST CLASS MAIL

The Hon. Karen V. Gregory
Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Gregory:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Respondent's Status Report on Scheduling

Please contact me if you have any questions.

Sincerely,

Anjali Vohra

Anjali Vohra

Enclosures

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET Al

v.

MICHAEL HITRINOV, ET AL

Consolidated With

DOCKET NO. 1953(I)

KAIRAT NURGAZINOV, ET Al

v.

MICHAEL HITRINOV, ET AL

RESPONDENT'S STATUS REPORT ON SCHEDULING

Pursuant to the Initial Order, as modified by the Presiding Officer's Order of May 24, Respondents Empire United Lines and Michael Hitrinov submit the following status report on scheduling. As previously advised, Complainants declined to participate in discussion of a Joint Status Report despite the clear requirement to do so.

In proposing the below schedule, Respondents have taken into account a number of considerations, including (i) Respondents' belief that the "just, speedy, and inexpensive determination" of this matter called by FMC Rule 1 can best be secured by first resolving Respondents' Motion for Judgment on the Pleadings, without much, if any, time consuming and costly discovery, and (ii) that Counsel for Respondents will be out of the country during the period June 23 through July 5, 2016. The former consideration is reflected, inter alia, in the proposal that discovery pending resolution of the Motion for Judgment on the Pleadings be

placed under the supervision of the Presiding Officer, while the latter is reflected, inter alia, in the considerable extra time afforded Complainants to respond to the Motion for Judgment on the Pleadings and the slight extension for Respondents' reply thereto.

PROPOSED SCHEDULE

June 10 – Respondents' Motion for Judgment on the Pleadings (already filed)

July 5 – Complainants' Response to Motion for Judgment

July 15 – Respondents' Reply

[Discovery prior to Decision on Motion for Judgment limited to that needed for Motion for Judgment and subject to prior approval of Presiding Officer]

Date X – Decision on Motion for Judgment

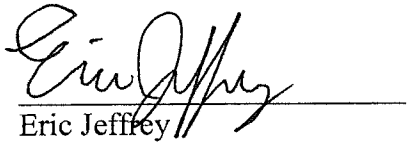
Date X – [If Needed] Discovery begins, subject to possible motion to limit discovery pending motion for summary judgment

Date X + 15 – Interrogatories and Requests for Documents due. Notices of Deposition may be sent for depositions, with all depositions to be taken within the period August 1, 2016 through September 30, 2016

Date X + 45 – Responses to Interrogatories and Requests for Documents due

October 21, 2016 – Discovery ends

Respectfully submitted,



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