

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET AL

v.

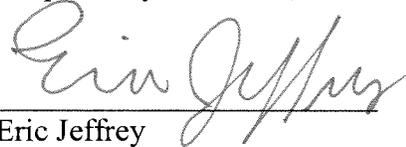
MICHAEL HITRINOV ET AL

MOTION FOR LEAVE TO SUPPLEMENT RESPONSE

Pursuant to Rules 69 and 71, Specially-Appearing Respondents move for leave to file the following, brief, supplement regarding a fact Respondents learned yesterday that may be relevant to whether Respondents received service of the Motion for Default herein.¹

“It has just come to Specially-Appearing Respondents’ attention that Counsel for Complainants has asked the United States Post Office to initiate some sort of investigation regarding the return of certain mail addressed by Counsel to Empire (perhaps the motion for default and attachments in this case?). To the extent this is correct it could explain how Empire did not receive any notice of the default proceedings prior to the Presiding Officer’s email notice of the Order to Show Cause. This appears to us as another reason for the Presiding Officer to give Respondents the benefit of the doubt. Or perhaps Counsel for Complainants could shed some light on this issue, which seems very relevant to the Order to Show Cause, by disclosing the nature of the mail at issue?”

Respectfully submitted,



Eric Jeffrey

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¹ The undersigned attempted to confer with Counsel for Complainants, but was unsuccessful.

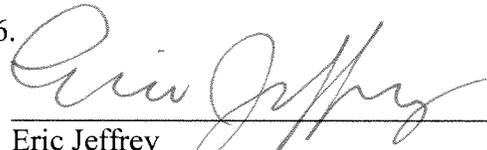
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document via electronic and first-class mail to the following:

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Dated at Washington, DC, this 6th day of May, 2016.


Eric Jeffrey
Counsel for Respondents