

BEFORE THE
FEDERAL MARITIME COMMISSION

Docket No. 16-03

KSB SHIPPING & LOGISTICS LLC

COMPLAINANT,

v.

DIRECT CONTAINER LINE ALSO KNOWN AS VANGUARD LOGISTICS,

RESPONDENT.

JOINT STATUS REPORT

Pursuant to the Initial Order entered in this proceeding, and the Order Denying Motion to Dismiss Complaint in Lieu of Answer, KSB Shipping & Logistics LLC (“KSB”) and Direct Container Line a/k/a Vanguard Logistics (“Direct Container Line”), submit this Joint Status Report.

Counsel for KSB and Direct Container Line had a meet and confer on May 18, 2016 in order to: a) establish a proposed scheduling order for the completion of discovery, including initial disclosures and discovery related to experts; 2) resolve to the fullest extent possible disputes relating to discovery matters; and c) expedite, limit, or limit discovery by use of admissions, stipulations, and other techniques.

Pursuant to that meet and confer, the parties jointly propose that:

1. The deadline for initial disclosures will be May 27, 2016;
2. The deadline for identifying experts and providing expert reports will be September 7, 2016.

3. The deadline for completion of discovery will be October 7, 2016; and
4. The parties will comply with the discovery provisions and limitations set forth in 46 CFR Section 502.201 *et seq.* To the extent that a party wishes to deviate from those provisions, such a request may be made to the presiding officer.

The Parties also submit that they have contacted CADRS in order to schedule a preliminary conference via telephone call on Monday, May 23rd.

Respectfully submitted,



Brendan Collins
David P. Street
GKG LAW, PC
1055 Thomas Jefferson Street, NW
Suite 500
Washington, DC 20007
Telephone: 202/342-5200
Facsimile: 202/342-5219
Email: bcollins@gkglaw.com
dstreet@gkglaw.com

Attorneys for *KSB Shipping & Logistics LLC*



Daniel G. McDermott
MARSHALL, DENNEHEY, WARNER
COLEMAN & GOGGIN
Wall Street Plaza
88 Pine Street, 21st Floor
New York, NY 10005
Telephone: 212/376-6400
Facsimile: 212/3766490
Email: dgmcdermott@mdwgcg.com

Attorneys for *Direct Container Line a/k/a
Vanguard Services*

Dated: May 20, 2016

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was delivered to the following addressees at the addresses stated by depositing same in the United State mail, first class postage prepaid, and/or by electronic transmission, this 20th day of May 2016:

Daniel G. McDermott
MARSHALL, DENNEHEY, WARNER
COLEMAN & GOGGIN
Wall Street Plaza
88 Pine Street, 21st Floor
New York, NY 10005
Telephone: 212/376-6400
Facsimile: 212/3766490
Email: dgmcdermott@mdwcg.com

Cameron W. Roberts
ROBERTS & KEHAGIARAS LLC
One World Trade Center, Suite 2350
Long Beach, CA 90831
cwr@tradeandcargo.com
310-642-9800 x 7002


