

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 16-03

KSB SHIPPING & LOGISTICS LLC

v.

DIRECT CONTAINER LINES ALSO KNOWN AS VANGUARD LOGISTICS

**RESPONDENT, VANGUARD LOGISTICS SERVICES (USA), Inc., DOING BUSINESS UNDER TRADE
NAME DIRECT CONTAINER LINE, CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Pursuant to Rules 69 and 102 of the Commission's Rules of Practice and Procedure and 46 C.F.R. §§ 502.69, 502.102, respondent Vanguard Logistics Services (USA), Inc., doing business under trade name Direct Container Line, Federal Maritime Commission ("Commission") license number 017237 (hereinafter "Direct"), erroneously named in the complaint as Direct Container Lines also known as Vanguard Logistics, by and through its undersigned counsel, respectfully requests the grant of an additional twenty-one (21) days, until March 29, 2016, within which to file responsive pleadings, and in support states as follows:

1. That respondent's responsive pleading is currently due on March 8, 2016.
2. The undersigned counsel was retained to defend Direct within the past six business days and requires additional time to review and investigate the allegations made in the complaint and underlying documentation concerning the disputed shipment.
3. That counsel for Direct underwent an unexpected surgical procedure on March 3, 2016, that makes it difficult to work.

4. Undersigned counsel has conferred with Mr. Nitin Bhagat, Director, of complainant KSB Shipping & Logistics LLC ("KSB"). Mr. Nitin Bhagat is acting on behalf of KSB while Sridhar Rajagopalan is overseas and he has authorized Direct to state that KSB does not object to the requested extension.

Counsel for Direct therefore respectfully moves the presiding Administrative Law Judge to grant an additional twenty-one (21) days up to and including March 29, 2016 in which to file its answer or other dispositive motion. The grant of such an extension under these circumstances is consistent with prior Commission precedent and procedures and will promote the administration of justice and the efficient disposition of this case. *See Great White Fleet, Ltd. v. Southeastern Paper Prods. Export, Inc.* 26 SRR 1374 [ALJ, 1994]; *Puerto Rico Freight Sys., Inc. v. R & S Trading and J.C. Trading*, 27 SRR 141 [ALJ, 1995].

Dated: March 7, 2016

Respectfully submitted,

By:



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Attorneys for respondent Direct
Container Lines aka Vanguard Logistics

CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of March, 2016, served a copy of the foregoing RESPONDENT DIRECT CONTAINER LINES CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS by First-Class Mail and e-mail upon the following:

Sridhar Rajagopalan
Email: rsridhar@ksbshipping.com
Nitin Bhagat
Email: nitin@ksbshipping.com
KSB Shipping & Logistics LLC
50 Cragwood Road, #123
South Plainfield, NJ 07080

And

Karen V. Gregory, Secretary
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Joanne Sattler