

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 16-17

**CONNIE LANE CHRISTY and CHRISTY COLLECTION INTERNATIONAL INC. on
Behalf of THE ANNIE GRACE FOUNDATION FOR THE CHILDREN OF BALI
INDONESIA**

v.

AIR 7 SEAS TRANSPORT LOGISTICS INC.

**RESPONDENT AIR 7 SEAS TRANSPORT LOGISTICS INC.'S 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 Air 7 Seas Transport Logistics Inc., Federal Maritime Commission ("Commission") license number 002724 (hereinafter "Air 7") by and through its undersigned counsel, respectfully requests the grant of an additional twenty-eight (28) days, until January 13, 2017, within which to file responsive pleadings, and in support states as follows:

1. That respondent's responsive pleading is currently due on December 16, 2016.
2. The undersigned counsel was retained to defend Air 7 within the past three business days and requires additional time to review and investigate the allegations made in the complaint and underlying documentation concerning the disputed shipment.
3. Additional time is needed due to the holiday season and unavailability of witnesses.
5. That counsel for Air 7's wife is having a surgical procedure on December 26, 2016 that will make it difficult to work on this case.

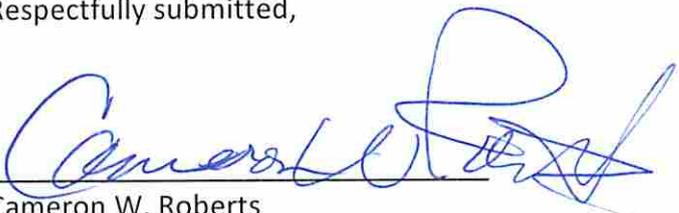
6. Undersigned counsel has left two telephone messages on December 14, 2016, and one phone message on December 15, 2016, and sent five e-mails to in *pro per* complainant Connie Lane Christy and Christy Collection International Inc. on Behalf of The Annie Grace Foundation For The Children Of Bali Indonesia ("Christy"). Christy has not accepted counsel's offer to meet and confer via telephone. Christy refused to agree to an extension but wanted counsel to agree to mediation. She has not provided any other information about that request despite counsel's multiple e-mails requesting a meet and confer. See Exhibit "A."

7. Counsel for Air 7 therefore respectfully moves the presiding Administrative Law Judge to grant an additional twenty-eight (28) days up to and including January 13, 2017 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: December 15, 2016

Respectfully submitted,

By:



Cameron W. Roberts
cwr@tradeandcargo.com
(310) 642-9800 x7002
ROBERTS & KEHAGIARAS LLP
One World Trade Center, Suite 2350
Long Beach, CA 90831

Attorneys for respondent
Air 7 Seas Transport Logistics Inc.,

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of December, 2016, served a copy of the foregoing RESPONDENT AIR 7 SEAS TRANSPORT LOGISTICS INC.'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS by First-Class Mail and e-mail upon the following:

Connie Lane Christy
667 Blackstone Dr.
Myrtle Beach, SC 29588
Clchristy4544@gmail.com

And

Karen V. Gregory, Secretary
Federal Maritime Commission
Office of the Secretary
800 North Capitol Street, N.W.
Washington, DC 20573-0001
Email: secretary@fmc.gov


Joanne Sattler
Joanne Sattler

EXHIBIT "A"

EXHIBIT A - MOTION FOR EXTENSION OF TIME

Cameron Roberts

From: Cameron Roberts
Sent: Thursday, December 15, 2016 9:07 AM
To: 'Connie Lane Christy'
Cc: Office
Subject: RE: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time

Dear Ms. Christy:

I did not hear back from you. I just left another voicemail for you at 614-746-9182 concerning the requested extension. Please reply to this e-mail or give me a call back to discuss the extension, the case, the status of negotiations, etc.

Sincerely yours,

Cameron Roberts

ROBERTS & KEHAGIARAS LLP
PHONE: (310) 642-9800 x 7002, FACSIMILE: (310) 868-2923, DIRECT: (310) 448-2997
E-MAIL: cwr@tradeandcargo.com
WWW.TRADEANDCARGO.COM - PRIVILEGED COMMUNICATION — PRIVATE AND CONFIDENTIAL

From: Cameron Roberts
Sent: Wednesday, December 14, 2016 5:54 PM
To: 'Connie Lane Christy' <clchristy4544@gmail.com>
Cc: Office <Office@tradeandcargo.com>
Subject: RE: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time

Ms. Christy:

Can we agree to speak tomorrow at 9:30 AM PACIFIC?

Sincerely yours,

Cameron Roberts

ROBERTS & KEHAGIARAS LLP
PHONE: (310) 642-9800 x 7002, FACSIMILE: (310) 868-2923, DIRECT: (310) 448-2997
E-MAIL: cwr@tradeandcargo.com
WWW.TRADEANDCARGO.COM - PRIVILEGED COMMUNICATION — PRIVATE AND CONFIDENTIAL

From: Cameron Roberts
Sent: Wednesday, December 14, 2016 10:41 AM
To: 'Connie Lane Christy' <clchristy4544@gmail.com>
Subject: RE: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time

Ms. Christy:

I received the file yesterday. I don't know what you're referring to. Please call me so we can discuss this, as extensions of less than 30 days are routine and customary. I am in the office all day.

Sincerely yours,

Cameron Roberts

ROBERTS & KEHAGIARAS LLP
PHONE: (310) 642-9800 x 7002, FACSIMILE: (310) 868-2923, DIRECT: (310) 448-2997
E-MAIL: cwr@tradeandcargo.com
WWW.TRADEANDCARGO.COM - PRIVILEGED COMMUNICATION — PRIVATE AND CONFIDENTIAL

From: Connie Lane Christy [<mailto:clchristy4544@gmail.com>]
Sent: Wednesday, December 14, 2016 10:30 AM
To: Cameron Roberts <CWR@tradeandcargo.com>
Subject: RE: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time

I do not agree with this extension. You had just as much time as I did to respond to the complaint and decide whether it could be mediated.

Mediation or not? Simple question here.

Connie Lane Christy

From: Cameron Roberts [<mailto:CWR@tradeandcargo.com>]
Sent: Wednesday, December 14, 2016 1:02 PM
To: clchristy4544@gmail.com
Cc: Office
Subject: RE: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time
Importance: High

Dear Ms. Christy:

I just left a voicemail for you at 614-746-9182 concerning the requested extension. Please reply to this e-mail or give me a callback.

Sincerely yours,

Cameron Roberts

ROBERTS & KEHAGIARAS LLP
PHONE: (310) 642-9800 x 7002, FACSIMILE: (310) 868-2923, DIRECT: (310) 448-2997
E-MAIL: cwr@tradeandcargo.com
WWW.TRADEANDCARGO.COM - PRIVILEGED COMMUNICATION — PRIVATE AND CONFIDENTIAL

From: Cameron Roberts
Sent: Tuesday, December 13, 2016 3:23 PM
To: 'clchristy4544@gmail.com' <clchristy4544@gmail.com>
Cc: Office <Office@tradeandcargo.com>
Subject: CLC v. Air 7 Seas - Docket 16-17 - Request for extension of time
Importance: High

Dear Ms. Christy:

I represent Air 7 Seas. I just received notice of the formal claim filed with the FMC (Commission). I understand a response is due on Friday, December 16, 2016. I need time to review the claim file, pleadings, etc., and I have a number of preexisting commitments. Accordingly, I would appreciate an extension of time up to and including Friday, January 13, 2017.

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].

Please confirm that the requested extension of time is acceptable.

Sincerely yours,

Cameron Roberts



ROBERTS & KEHAGIARAS LLP
ATTORNEYS AND COUNSELORS AT LAW

ONE WORLD TRADE CENTER, SUITE 2350

LONG BEACH, CA 90831

WWW.TRADEANDCARGO.COM

PHONE: (310) 642-9800 x 7002 - FACSIMILE: (310) 868-2923 - DIRECT: (310) 448-2997 - E-MAIL: cwr@tradeandcargo.com

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<http://www.tradeandcargo.com/modules/contents/index.php/content0012.html>

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