

FEDERAL MARITIME COMMISSION

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SMARTSTONE PRIVATE LIMITED

Claimants,

-against-

Formal Docket No. 1946(F)

GENERAL NOLI USA, INC., and  
SAVINO DEL BENE FREIGHT FORWARDERS  
(INDIA) PVT LTD,

Respondents.

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**GENERAL NOLI’S MOTION FOR AN EXTENSION OF THE BRIEFING DEADLINES DUE TO THE PENDING FILING OF THE PARTIES’ JOINT MOTION FOR APPROVAL OF THEIR SETTLEMENT AGREEMENT**

Respondent General Noli USA, Inc. (“General Noli”), by its undersigned attorneys, Clyde & Co US LLP, hereby moves for an extension of the briefing schedule set forth in the Honorable Erin M. Wirth’s order dated May 29, 2015, due to the pending filing of the parties’ joint motion for approval of a settlement agreement and Judge Wirth’s determination thereon.

Currently, complainant Smartstone Private Limited (“Smartstone”), respondents General Noli and Savino Del Bene Freight Forwarders (India) Pvt Ltd., and non-party Expo Granite Marble LLC are finalizing the settlement and have been working together to resolve all claims.

In the interest of conserving resources and efficiency, General Noli proposed to Smartstone that the parties should file a joint motion to stay the instant proceedings until after the parties’ submission and Judge Wirth’s determination of the joint motion seeking approval of the settlement agreement. Smartstone did not agree to the joint motion for an indefinite stay but

instead requested that counsel for General Noli “request and get another extension of date from the honorary judge . . . .”

Accordingly, in the interest of conserving resources and efficiency and the Federal Maritime Commission’s strong and consistent policy of encouraging settlements, General Noli submits this motion respectfully requesting an extension of the briefing schedule as follows:

Respondents’ Opposition Brief: from June 25, 2015 to July 16, 2015; and  
Smartstone’s Reply Brief: from July 16, 2015 to August 6, 2015.

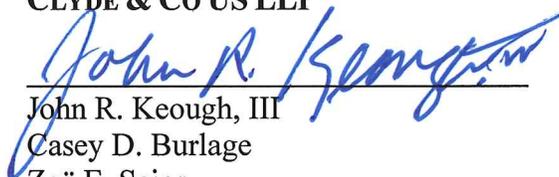
Such an extension affords the parties the opportunity to finalize and submit their motion for approval of the settlement agreement and also provides Judge Wirth with time to review and make a determination on that motion.

**CONCLUSION**

For the reasons stated above, General Noli respectfully requests an order granting this motion and extending the briefing deadlines.

Dated: New York, New York  
June 24, 2015

**CLYDE & Co US LLP**



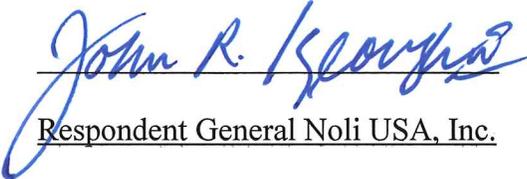
John R. Keough, III  
Casey D. Burlage  
Zoë E. Sajor  
The Chrysler Building  
405 Lexington Avenue, 16<sup>th</sup> Floor  
New York, New York 10174  
Tel: (212) 710-3900  
Fax: (212) 710-3950

*Attorneys for respondents  
General Noli USA, Inc., and Savino  
Del Bene Freight Forwarders (India) Pvt Ltd.*

**Certificate of Service**

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by electronic mail a copy to each such person in sufficient time to reach such person on the date the document was filed with the Commission.

Dated at New York, New York, this 24th day of June, 2015

Signature:   
For: Respondent General Noli USA, Inc.