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May 19, 2015

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BY EMAIL

Hon. Erin M. Wirth
Administrative Law Judge
Federal Maritime Commission
800 North Capitol Street, N.W., Suite 932
Washington, D.C. 20573

Re: *Smartstone Pvt. Ltd v. General Noli USA Inc. and
Savino Del Bene Freight Forwarders (India) Pvt. Ltd.,
Docket No. 1946(F)*

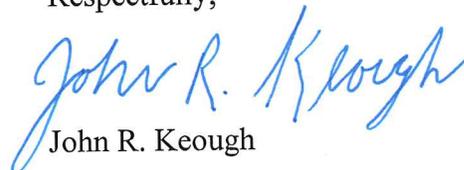
Dear Judge Wirth,

We are attorneys for respondents General Noli USA Inc. and Savino Del Bene Freight Forwarders (India) Pvt. Ltd. in the captioned proceeding against claimant Smartstone Private Limited (“Smartstone”).

Pursuant to your Order dated February 27, 2015, respondents’ brief in opposition to Smartstone’s initial brief in the captioned matter is due on or before May 21, 2015. However, the parties are engaged in ongoing settlement discussions, and thus we respectfully request a brief extension of the deadline for respondents to file their opposition brief from May 21, 2015 to June 1, 2015, to allow the parties to continue to discuss settlement of Smartstone’s claim. We conferred with Smartstone who does not consent to our request based on their assertion that the deadlines set by the Federal Maritime Commission may not be altered by their consent.

Respondents respectfully reserve all rights and defenses, none of which is waived.

Respectfully,


John R. Keough

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Administrative Law Judge
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CLYDE & CO

cc: **BY EMAIL**
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