

ORIGINAL

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2009 JUN 26 PM 1:07

FEDERAL MARITIME COMMISSION



BEFORE THE FEDERAL MARITIME COMMISSION

NAVEENA EXPORTS, LTD.,

Complainant,

v.

GO-TRANS, INC.,

Respondent

FMC Docket: 09-03

FORMAL DOCKET COMPLAINT

SUBPART K – SHORTENED
PROCEDURE REQUESTED

STATEMENT OF FACTS
INCORPORATED HEREIN

THE RAVJI LAW FIRM
Attorneys for Complainant
8500 N. Stemmons Frwy. Ste. 4050
Dallas, Texas 75247
Tel: (972) 233-4190
Fax: (972) 233-5105

INTRODUCTION

Complainant, NAVEENA EXPORTS, LTD. (“Naveena”), by and through its attorneys, THE RAVJI LAW FIRM, brings this Complaint against Respondent, GO-TRANS, INC. (“Go-Trans”), and shows as follows:

THE COMPLAINANT

1. Complainant Naveena Exports, Ltd., is a foreign limited partnership organized under the laws of the State of Pakistan with its principal place of business at NR. 24/1, Sector 23, Korangi Industrial Area, Karachi, Pakistan.

2. Complainant’s principal and authorized representative is Mr. Saqib Riaz.

3. Complainant is a manufacturer engaged in the business of exporting apparel goods into the United States of America.

4. The address and contact information of Complainant’s attorneys is as follows:

THE RAVJI LAW FIRM
8500 N. Stemmons Frwy., Ste. 4050
Dallas, Texas 75247
Tel: (972) 233-4190
Fax: (972) 233-5105

RESPONDENT

5. Respondent Go-Trans, Inc. is a corporation organized under the laws of the State of New York with its principal place of business at 147-48 175th Street, Suite 2F, Jamaica, New York 11434.¹

6. Respondent’s principal and authorized representative is Mr. Mohammed (a/k/a/ Mo) Bhatti.

¹ See Exhibit A: New York Department of State Records, Entity Information

7. Respondent is a forwarding agent (a/k/a ocean transportation intermediary) engaged in the business of facilitating maritime shipments between exporters and importers.

STATEMENT OF FACTS

8. Between April 2008 and July 2008, Complainant shipped apparel goods from Karachi, Pakistan, to be imported into the United States of America and delivered to Ambition Apparel, Inc. ("Buyer")

9. Respondent is designated as the forwarding agent on the Original Bill of Lading for four shipments of containers Complainant sent to Buyer.²

10. Respondent released four containers to Buyer without being presented an original house bill of lading and without Complainant's consent; Respondent apparently took such action upon Buyer's assurance of indemnity.³

AS AND FOR A CAUSE OF ACTION

11. Complainant herein fully incorporates each and every allegation in the foregoing paragraphs as if set forth at length.

12. Complainant has not received payment for the four containers Respondent wrongfully released:

- a. Container No. FSCU 652027-2, transported from Karachi to New York under Go-Trans Bill of Lading No. CSL-KHI 505675-NYK⁴
- b. Container No. TEXU 4810415, transported from Karachi to New York under Go-Trans Bill of Lading No. CSL-KHI 505722-NYK⁵

² See Exhibits B, C, D, E

³ See Exhibit F; Letter of Indemnity to Respondent from Buyer

⁴ See Exhibit B

⁵ See Exhibit C

- c. Container No. HDMU 6527270, transported from Karachi to Los Angeles under Go-Trans Bill of Lading No. CSL-KHI 505889-LOS⁶
- d. Container No. HDMU 618392-9, transported from Karachi to Los Angeles under Go-Trans Bill of Lading No. CSL-KHI 505978-LOS⁷

13. Respondent has failed to comply with Complainant's repeated demand for payment for the aforementioned containers.⁸

14. Complainant has performed all duties and obligations on its part.

15. Respondent wrongfully and/or intentionally breached its fiduciary duty to ensure payment is made to shipper before releasing goods by releasing the containers to Buyer before Complainant received payment and without Complainant's consent.

16. Respondent's release of the containers to Buyer constitutes a violation of §10(d) of the Shipping Act of 1984. Because of Respondent's violation of the Shipping Act, Complainant incurred damages in the amount of \$342,070.80.⁹

**STATEMENT OF INFORMAL DISPUTE RESOLUTION &
REQUEST FOR SUBPART "K" SHORTENED PROCEDURE**

17. Complainant and Respondent attempted to informally resolve this dispute through meetings and correspondence between Complainant's and Respondent's representatives, agents, and principals.

⁶ See Exhibit D

⁷ See Exhibit E

⁸ See Exhibits G and H; Demand Letters dated November 17, 2008, and January 13, 2009.

⁹ See Exhibits I, J, K, L; Commercial Invoices corresponding to Exhibit B, C, D, E, respectively

18. Respondent has agreed not to contest this Complaint in order to allow Complainant to secure the release of FMC Bond # 18084F, in partial payment of the total damages incurred by Complainant.¹⁰

19. Complainant expects that Respondent will not appear to answer the allegations herein and, as such, requests the Commission's approval for a Shortened Procedure, without hearing or oral argument, in accordance with Subpart K.

WHEREFORE, Complainant respectfully requests:

- a. That an Order for Reparations be entered in favor of Complainant and against Respondent, in the amount of \$342,070.80, for Respondent's violation of Section 10(d) of the Shipping Act of 1984;
- b. That the Commission grant such other, proper, and further relief, in accordance with its delegated powers, as it may deem just, proper, and equitable in the circumstances.

Dated: June 23, 2009, Dallas, Texas

Respectfully submitted,

THE RAVJI LAW FIRM



Aamer Ravji
SBN: 00798655
Benjamin Palatiere
SBN: 24058694
8500 N. Stemmons Frwy., Ste. 4050
Dallas, Texas 75247
Tel: (972) 233-4190
Fax: (972) 233-5105

Attorneys for Complainant,
Naveena Exports, Ltd.

¹⁰ See Exhibit M; email from Respondent's principal and authorized representative directing Complainant to file a claim with the Commission in order to receive payment of FMC Bond # 18084F

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: GO-TRANS (NEW YORK), LTD.

Selected Entity Status Information

Current Entity Name: GO-TRANS (NORTH AMERICA) INC.

Initial DOS Filing Date: APRIL 16, 2002

County: QUEENS

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

GO-TRANS (NORTH AMERICA) INC.

147-48 175TH STREET STE 2F

JAMAICA, NEW YORK, 11434

Registered Agent

NONE

This office does not require or maintain information regarding the names and addresses of officers, shareholders or directors of a corporation.

*Stock Information

# of Shares	Type of Stock	\$ Value per Share
200	No Par Value	

*Stock information is applicable to domestic business corporations.

Name History

Filing Date	Name Type	Entity Name
JUL 03, 2002	Actual	GO-TRANS (NORTH AMERICA) INC.
APR 16, 2002	Actual	GO-TRANS (NEW YORK), LTD.

EXHIBIT A

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: GO-TRANS (NORTH AMERICA) INC.
Selected Entity Status Information

Current Entity Name: GO-TRANS (NORTH AMERICA) INC.
Initial DOS Filing Date: APRIL 16, 2002
County: QUEENS
Jurisdiction: NEW YORK
Entity Type: DOMESTIC BUSINESS CORPORATION
Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)
GO-TRANS (NORTH AMERICA) INC.
147-48 175TH STREET STE 2F
JAMAICA, NEW YORK, 11434

Registered Agent

NONE

This office does not require or maintain information regarding the names and addresses of officers, shareholders or directors of a corporation.

*Stock Information

# of Shares	Type of Stock	\$ Value per Share
200	No Par Value	

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Name History

Filing Date	Name Type	Entity Name
JUL 03, 2002	Actual	GO-TRANS (NORTH AMERICA) INC.
APR 16, 2002	Actual	GO-TRANS (NEW YORK), LTD.

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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GO-TRANS EXPRESS LIMITED

BILL OF LADING

GO-TRAN

Member of GO-TRANS

SHIPPER (Name and Full Address)
NAVELINA EXPORTS LTD
PLOT NR 24-E, SECTOR 23
KORANGI INDUSTRIAL AREA,
KARACHI-74900, PAKISTAN

BOOKING NUMBER:
BY NUMBER:
CGL KH 405675 NYC

EXPORT REFERENCES

CONSIGNEE (Name and Full Address/Non-Negotiable unless Consigned to Order)
TO ORDER OF:
ALLIED BANK LTD
KARACHI PAKISTAN

FORWARDING AGENT REFERENCES:
GO-TRANS NYC
147-32 Farmers Blvd.
Jamaica, NY 11434
Ph: (718) 543 6100
Fx: (718) 543 2168

FORM T NO. ARI 000137 DT 17/04/2008

NOTIFY PARTY/INTERMEDIATE CONSIGNEE (Name and Full Address)
AMBITION APPAREL, INC.
512 7TH AVENUE, 15TH FLOOR,
NEW YORK, NY 10018

ALSO NOTIFY (Name and Full Address) DOMESTIC RECEIPT EXPORT INSTRUCTIONS

1st ORIGINAL

Table with 4 columns: INITIAL CARRIAGE, PLACE OF RECEIPT, EXPORT CARRIER, PORT OF LOADING, NO OF ORIGINAL B/Ds, TYPE OF BLANK, PORT OF DISCHARGE, PLACE OF DELIVERY, FINAL DESTINATION.

PARTICULARS FURNISHED BY SHIPPER

Main table with columns: MATR'S AND NUMBERS, NAME OF PACKAGE, DESCRIPTION OF PACKAGES AND QUANT, GROSS WEIGHT, MEASUREMENTS. Includes 'SHIPPED ON BOARD' stamp and 'Consolidation Shipping & Logistics' signature.

Table with columns: FREIGHT AND CHARGES, RATED AS, RATE, PFR, PREPAID, COLLECT. Includes a 'TOTAL' row at the bottom.

The consignee of the goods... The carrier is not responsible for... The consignee shall be liable for... The carrier shall be liable for... The consignee shall be liable for...

Consolidation Shipping & Logistics
27 APR 2008
KARACHI



GO-TRANS EXPRESS LIMITED

BILL OF LADING

GO-TRANS

Member of Transocean Group

SHIPPER (Name and Full Address)
WALTON EXPORTS LTD
PLOT NR 24-L, SECTOR 21
KORANGI INDUSTRIAL AREA,
KARACHI - 74900, PAKISTAN.

BOOKING NUMBER
BILL NUMBER
OSL-KHI-505722-NYK
EXPORT REFERENCES

CONSIGNEE (Name and Full Address/Non Negotiable Unless Consented to Order)
ALLIED BANK LIMITED
KARACHI PAKISTAN

FORWARDING AGENT REFERENCE
GO-TRANS NYC
147-32 Furness Blvd.
Jamaica, NY 11434
Ph.(718) 553 6100
Ex.(718) 553 2168

FORM NO: ABL-001313 DT: 29/04/2008

NOTIFY PARTY/INTERMEDIATE CONSIGNEE (Name and Full Address)
507, 10 AVENUE E, 15TH FLOOR
NEW YORK, NY 10008

ALSO NOTIFY (Name and Full Address)/DOMESTIC ROUTES
EXPORT INSTRUCTIONS

1st ORIGINAL

Table with 4 columns: INITIAL CARRIAGE, PLACE OF RECEIPT, PORT CARRIER, PORT OF LOADING, PART OF DISCHARGE, PLACE OF DELIVERY, NO. OF ORIGINAL BILLS SIGNED, TYPE OF ARRIVE, FINAL DESTINATION.

PARTICULARS FURNISHED BY SHIPPER

Main table with 5 columns: MATR. AND CONTAINER NOS., NOS. OF PACKAGES, DESCRIPTION OF THE GOODS AND WEIGHTS, GROSS WEIGHT, QUANTITY. Includes 'ORIGINAL' stamp and 'SHIPPED ON BOARD 05 MAY 2008'.

Table with 6 columns: EXHIBIT AND CHARGES, RAISED AT, DATE, PER, PREPND, COLLECT. Includes a TOTAL row at the bottom.

The Goods or the documents in this bill are to be taken as if they were... (Legal disclaimer text)

Consignment & Logistics
BY
Signature of the Carrier

OSL-KHI-505722-NYK KARACHI



GO-TRANS EXPRESS LIMITED

BILL OF LADING

GO-TRANS

SHIPPER (Name and Full Address)
POLYMER UNIT, SECTOR 11
KORANG ROAD, STRAIT AREA,
KARACHI 74000 PAKISTAN

BOOKING NUMBER
EXPORT REFERENCE

CONSIGNEE (Name and Full Address) (Responsible Unless Consigned to Order)
WELLS FARGO BANK S.A.

FORWARDING AGENT REFERENCES
GO-TRANS INCORPORATED
601 WEST CAROL STREET
HOUSTON, TEXAS 77002 USA

FORWARDING AGENT (Name and Full Address)
CONSIGNEE (Name and Full Address)

ALSO NOTIFY (Name and Full Address)
EXPORT INSTRUCTIONS

NOTIFY PARTY (Name and Full Address)
AMERICAN AIR FREIGHT
242 7TH AVENUE, 15TH FLOOR
NEW YORK, NY 10018

1st ORIGINAL

Table with 4 columns: INITIAL CARRIAGE, PLACE OF RECEIPT, EXPORT CARRIER, PORT OF LOADING, PORT OF DISCHARGE, PLACE OF DELIVERY, NO OF ORIGINAL BILLS, FINAL DESTINATION.

PARTICULARS FURNISHED BY SHIPPER

Main table with columns: MARKS AND NUMBERS, NUMBER OF PACKAGES, DESCRIPTION OF PACKAGES AND CONTENTS, WEIGHT, MEASUREMENTS.

SHIPPED ON BOARD
12 JAN 2008
Consolidation Shipping & Logistics

Table with columns: FREIGHT AND CHARGES, RATED AS, RATE, PER, PREPAID, COLLECT, TOTAL.

THE SHIPPER'S RESPONSIBILITY...
Consolidation Shipping & Logistics



GO-TRANS EXPRESS LIMITED

BILL OF LADING

FORM B/L 1000

RECEIVED BY THE ADDRESSEE
KAVI EXPORTS LTD
PLOT NO 201, SECTOR 25,
KORANGA INDUSTRIAL AREA,
KARACHI-74000, PAKISTAN

BOOKING NUMBER
EXPORT REFERENCENOS
ALL DOCUMENTS
CASH SETTLEMENT ONLY

Consignor (Name and Full Address) (Non-Negotiable Unless Consigned to Order)
YOUR CLIENT
WELLS FARGO BANK, N.A.

FORWARDING AGENT REFERENCES
GO TRANS (NORTH AMERICA) LTD
GO TRANS NORTH AMERICA INC.
601 W. CAROL STREET
COMPTON, CA 90220
TEL: 310-511-1115

FORMET NO. 101 02 088 09 111 2 000 0000

Notify Party (Name and Full Address)
AMERICAN APPAREL, INC
512 7TH AVENUE, 15TH FLOOR,
NEW YORK, NY 10018

ALSO NOTIFY (Name and Full Address, TERMS, RATES & EXPORT INSTRUCTIONS)

1st ORIGINAL

INITIAL CARRIAGE	PLACE OF RECEIPT KARACHI / PAKISTAN	NO. OF ORIGINAL B/L(S) SIGNED 3	TYPE OF B/L
EXPORT CARRIER (Vessel voyage) MOI ALHEDIY / MSL	PORT OF LOADING KARACHI / PAKISTAN		
DISCHARGE LOS ANGELES USA	PLACE OF DELIVERY LOS ANGELES USA	FINAL DESTINATION (For The Merchant's Reference Only)	

PARTICULARS FURNISHED BY SHIPPER

MARKS AND NUMBERS CONTAINER NUMBER	NO. OF PACKAGES	DESCRIPTION OF PACKAGES AND WEIGHTS	DATE OF ISSUE
PARIS BLUE, STYLF CUCOR POB SIZE QUANTITY CARBONS OF MADE IN PAKISTAN	100 CANS	100 CANS PO NUMBER 083E PO NUMBER 083E PO NUMBER 083E PO NUMBER 083E LADIES'S POCKET LC NO. 1122 701 DATE: 07/07/08	"FREIGHT COLLECT" CYC SHIPPER TO D & CO INC B/terminal charges & demurrage III at the port of discharge Destination as per bill of lading at the amount of invoice DATE OF ISSUE 11/07/08 SHIPPED ON BOARD 11/07/08
CONTAINER NO. 1 100183029 / 10110	SEAL NO. 196212		

Consolidation Shipping & Logistics

WEIGHT	RATED AS	RATE	PER	AMOUNT	EXCESS
TOTAL					

The undersigned hereby certifies that the above particulars are true and correct and that the goods are in conformity with the bill of lading and that the goods are in conformity with the bill of lading and that the goods are in conformity with the bill of lading...

Consolidation Shipping & Logistics

DATE AND PLACE OF ISSUE
11/07/2008 KARACHI

Ambition Apparel, INC.

512 7th Avenue, 15th Floor, New York, NY 10018
usman@ambitionapparel.com

TEL 212-461-6900
FAX 212-461-6999

LETTER OF INDEMNITY

TO
GO-Trans(North America)Inc
147-32 Farmers Blvd, 2/F
Jamaica, NY 11434

Subject: Release Of Shipment

Container#	FSCU6520272
OBL#	CMDUPK1269513
Hbl#	CSL-KHI505675-NYK
ETD	
ETA	5/18/08
POL	Karachi-Pakistan
POD	New York
Invoice Value	71,064.00

We are requesting to release this shipment without the presentation of original house bill of lading of this shipment, this HBL is late in transit and did not receive by our bank. We will provide the original bill of lading endorsed by the bank as soon as received by our bank.

We also take complete responsibility of payment for this shipment that incase we failed to provide the original HBL, we will make full payment to shipper (Navena Export) OR our bank (Wells Fargo).

We will not hold go-trans (north America) responsible for any claim against this shipment.

Thanks for your cooperation.

Sincerely
Ambition Apparel

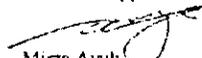

Mirza Ayub

EXHIBIT F

THE RAVJI LAW FIRM

ATTORNEY & COUNSELOR
www.ravjipc.com

8500 N. STEMMONS FWY.,
STE. 4050
DALLAS, TEXAS 75247
TEL: (972) 233-4190
FAX: (972) 233-5105

9301 SOUTHWEST FWY.,
STE. 250
HOUSTON, TEXAS 77074
TEL: (832) 200-0574
FAX: (713) 771-8303

November 17, 2008

VIA CMRRR: 7006 2760 0003 6756 9143

VIA REGULAR FIRST CLASS MAIL

Mr. Mo Bhatti
Go-Trans (North America) Inc.
147-32 Farmers Blvd.
Jamaica, NY 11434

**Re: Naveena Corporation v. Go-Trans, Inc. and Ambition Apparel, Inc.
DEMAND LETTER**

Dear Mr. Bhatti:

THE RAVJI LAW FIRM represents Naveena Corporation (hereinafter "the Claimant"). This letter, in addition to being a demand letter for payment of an outstanding balance of \$342,070.80 owed to the Claimant, is to provide you an opportunity to seek an amicable resolution with the Claimant.

Between April, 2008 through July 2008, Claimant shipped over three hundred thousand dollars (\$300,000.00) worth of manufactured goods to the buyer Ambition Apparels, Inc. (hereinafter the "Buyer"), in New York, NY. As part of this transaction, your company, Go-Trans, Inc. (hereinafter "Go"), was designated as the forwarding agent on the Original Bill of Ladings issued by the Claimant. As the forwarding agent you owed the Claimant a fiduciary duty to make certain that the Claimant received payment before goods were released to the Buyer. You breached your fiduciary obligation to the Claimant. It is our understanding that the goods were released by you to the Buyer (1) without the endorsed Original Bill of Ladings, (2) without the Claimant receiving payment for the goods; and (3) without the Claimant's consent.

In other words, not only are you civilly liable to breach of fiduciary duty, breach of contract, and civil its rightful ownership of personal property, and for w treble damages against you, but you are also criminal fourth degree¹ and larceny.²

¹ See NY CLS Penal §155.30 (2008): "A person is guilty steals property and when: 1. The value of the property exceeds one t

² See NY CLS Penal §155.30 (2008) § 155.05. "Larceny; defined

EXHIBIT G

7006 2760 0003 6756 9143

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
Domestic Mail Only, Postage Guaranteed (7006)	
NOV 17 2008	
Postage	\$ 0.00
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32
Postmark Here	
Sent to	Mr. Mo Bhatti <i>let's to Go-Trans</i>
Street, Apt. No., or PO Box No.	Go-Trans (North America) Inc.
City, State, ZIP+4	147-32 Farmers Blvd. Jamaica, NY 11434

THE RAVJI LAW FIRM

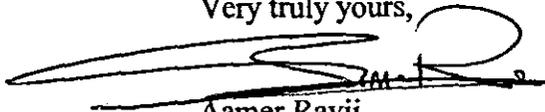
Mo Bhatti
Go-Trans, Inc.
November 17, 2008
Page -2-

It is also our understanding that you have already met with Mr. Saqib Riaz of Naveena Corporation to whom you admitted of your wrong doing. Therefore, it is obvious that this matter calls for your immediate attention. We ask that, upon receipt of this letter, you immediately call this office to discuss an amicable resolution to the civil nature of the charges Naveena Corporation can bring against you personally and against your company. We urge you to seek advise of counsel in this matter.

Therefore, in light of the above facts, the Claimant makes a demand for \$343,070.80 (THREE HUNDRED AND FORTY THREE THOURSAND AND SEVENTY DOLLARS AND AND EIGHTY CENTS) to be paid in full on or before 5:00 P.M. on Monday, December 1, 2008.

Finally, we are also demanding that you provide us copies of the documents, including any bill of ladings, based upon which the goods belonging to, and manufactured by, the Claimant were released to the Buyer. In the interim, if you have any questions do not hesitate to call me.

Very truly yours,



Aamer Ravji
ATTORNEY FOR NAVEENA
CORPORATION

ARR/AAA

CC: Saqib Riaz
Naveena Corporation

Mirza Ayub
Ambition Apparel, Inc.

1. A person steals property and commits larceny when, with intent to deprive another of property or to appropriate the same to himself or to a third person, he wrongfully takes, obtains or withholds such property from an owner thereof.

2. Larceny includes a wrongful taking, obtaining or withholding of another's property, with the intent prescribed in subdivision one of this section, committed in any of the following ways:

(a) By conduct heretofore defined or known as common law larceny by trespassory taking, common law larceny by trick, embezzlement, or obtaining property by false pretenses"

THE RAVJI LAW FIRM

ATTORNEY & COUNSELOR
www.ravjipc.com

8500 N. STEMMONS FWY.,
STE. 4050
DALLAS, TEXAS 75247
TEL: (972) 233-4190
FAX: (972) 233-5105

9301 SOUTHWEST FWY.,
STE. 250
HOUSTON, TEXAS 77074
TEL: (832) 200-0574
FAX: (713) 771-8303

January 13, 2009

VIA CMRRR: 7006 2760 0003 6756 9259

VIA REGULAR FIRST CLASS MAIL

Mr. Mo Bhatti
Go-Trans (North America) Inc.
147-32 Farmers Blvd.
Jamaica, NY 11434

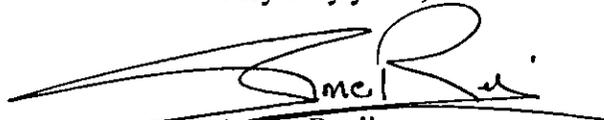
Re: *Naveena Corporation v. Go-Trans, Inc. and Ambition Apparel, Inc.*
DEMAND LETTER

Dear Mr. Bhatti:

On November 17, 2008 we served you with a demand letter on behalf of Naveena Corporation (hereinafter "the Claimant") for payment in the amount of \$342,070.80. In that letter we gave you an opportunity to amicably resolve this issue. You failed to contact us. In other words, you've ignored our demand.

Therefore, our only option is to commence legal proceedings against you. This letter is to advise you that we are in the process of filing suit against you to enforce our rights.

Very truly yours,



Aamer Ravji
ATTORNEY FOR NAVEENA
CORPORATION

ARR/AAA

CC: Saqib Riaz
Naveena Corporation

Mirza Ayub
Ambition Apparel, Inc.

EXHIBIT H



NAVEENA EXPORTS LTD.

PLOT NO.1 AND 2, SECTOR 28, KORANGI INDUSTRIAL AREA KARACHI - PAKISTAN

COMMERCIAL INVOICE							
1. Shipper/Exporter NAVEENA EXPORTS LTD. PLOT NR.24/1, SECTOR 23, KORANGI INDUSTRIAL AREA, KARACHI -74900, PAKISTAN		INVOICE DATE 16.04.08		INVOICE NO. W026/7078A/0408			
		OTHER INFORMATION FORM E NO. ABL-0003137					
2. For account & Risk of Messrs AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018		BY ORDER AND FOR ACCOUNT AND RISKS OF: AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018					
		COUNTRY OF ORIGIN PAKISTAN					
TRANSPORT DETAILS: BY SEA KARACHI - PAKISTAN NEW YORK USA VESSEL CMA CGM AEGEAN V/140W		TERMS OF DELIVERY AND PAYMENTS FOB AND D/A 180 DAYS FROM BL DATE					
SHIPPING MARKS ABSOLUTE FASHION / CROOKED INK STYLE COLOR PO # SIZE: QUANTITY CARTONS _____ OF _____ MADE IN PAKISTAN		NO. AND KINDS OF PACKAGES GOODS DESCRIPTION 840 CARTONS			GROSS WEIGHT 9030 KGS		VOLUME CBM / M3
					NET WEIGHT 8089 KGS		
S NO	DESCRIPTION	ORDER NO	CARTO	QUANTITY	UNIT PRICE US \$	AMOUNT US \$	
1	PO NUMBER CIK0007 STYLE : 5445 SH 100% COTTON MENS CARGO SHORTS	CIK0007	645	7740	\$7.05	\$54,567.00	
2	PO NUMBER RSK0055 STYLE : 4545 S 100% COTTON MENS TWILL CARGO SHORTS	RSK0055	195	2340	\$7.05	\$16,497.00	
CERTIFIED THAT THE ABOVE GOODS ARE OF PAKISTAN ORIGIN			TOTAL		10080	US \$	\$71,064.00

Naveena Exports Limited

EXHIBIT I

G.M. Exports



NAVEENA EXPORTS LTD.

PLOT NO.1 AND 2, SECTOR 28, KORANGI INDUSTRIAL AREA KARACHI - PAKISTAN

COMMERCIAL INVOICE							
1. Shipper/Exporter NAVEENA EXPORTS LTD. PLOT NR.24/1, SECTOR 23, KORANGI INDUSTRIAL AREA, KARACHI -74900, PAKISTAN		INVOICE DATE 05.05.08		INVOICE NO. W034/7091/0408			
		OTHER INFORMATION		FORM E NO. ABL-0003143			
2. For account & Risk of Messrs AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018		BY ORDER AND FOR ACCOUNT AND RISKS OF: AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018					
		COUNTRY OF ORIGIN PAKISTAN					
TRANSPORT DETAILS: VESSEL APL ALMANDINE V/8118 NEW YORK USA B/L NO. CSL-KHI-505722-NYK		TERMS OF DELIVERY AND PAYMENTS FOB BY SEA AND D/A 180 DAYS FROM BL DATE					
SHIPPING MARKS CROOKED INK STYLE# COLOR PO# SIZE QUANTITY CARTONS ____ OF ____ MADE IN PAKISTAN		NO. AND KINDS OF PACKAGES GOODS DESCRIPTION 186 CARTONS		GROSS WEIGHT 1756 KGS		VOLUME CBM / M3	
				NET WEIGHT 1528 KGS			
S NO.	DESCRIPTION	ORDER NO	CARTO	QUANTITY	UNIT PRICE US \$	AMOUNT US \$	
1	PO NUMBER CIK0008 STYLE : CID-274S MEN DENIM SHORTS	CIK0008	63	756	\$9.00	\$6,804.00	
2	PO NUMBER CIK0008 STYLE : CID-281S MEN DENIM SHORTS	CIK0008	65	780	\$9.00	\$7,020.00	
3	PO NUMBER CIK0008 STYLE : CID-281 MEN DENIM PANTS	CIK0008	29	348	\$9.95	\$3,462.60	
4	PO NUMBER CIK0008 STYLE : CID-274 MEN DENIM PANTS	CIK0008	29	348	\$9.95	\$3,462.60	
CERTIFIED THAT THE ABOVE GOODS ARE OF PAKISTAN ORIGIN			TOTAL		2232	US \$	\$20,749.20

Naveena Exports Limited

G.M Exports

EXHIBIT J



NAVEENA EXPORTS LTD.

PLOT NO.1 AND 2, SECTOR 28, KORANGI INDUSTRIAL AREA KARACHI - PAKISTAN

COMMERCIAL INVOICE						
1. Shipper/Exporter NAVEENA EXPORTS LTD. PLOT NR.24/1, SECTOR 23, KORANGI INDUSTRIAL AREA, KARACHI -74900, PAKISTAN		INVOICE DATE 06.06.08		INVOICE NO. W004/7108/0608		
		OTHER INFORMATION FORM E NO. SBL-0271969				
2. For account & Risk of Messrs AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018		BY ORDER AND FOR ACOUNT AND RISKS OF: AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018				
		COUNTRY OF ORIGIN PAKISTAN				
TRANSPORT DETAILS: BY SEA LOS ANEGELS VESSEL : HYUNDAI ADMIRAL V/HA502E		TERMS OF DELIVERY AND PAYMENTS FOB BY SEA AND LC 45 DAYS AFTER SIGHT LC NO. MII835094				
SHIPPING MARKS PARIS BLUE STYLE COLOR PO # SIZE: QUANTITY CARTONS _____ OF _____ MADE IN PAKISTAN		NO. AND KINDS OF PACKAGES GOODS DESCRIPTION 871 CARTONS		GROSS WEIGHT 12969 KGS		VOLUME CDM / M3
				NET WEIGHT 11924 KGS		
S NO.	DESCRIPTION	ORDER NO	CARTO	QUANTITY	UNIT PRICE US \$	AMOUNT US \$
CONTAINER NO. HDMU6527270						
1	PO NUMBER 6302 STYLE : CBG-27382 LADIES 5 POCKET PANTS	6302	164	3936	\$5.40	\$21,254.40
2	PO NUMBER 6303 STYLE : CBG-27188 LADIES 5 POCKET PANTS	6303	241	5784	\$5.40	\$31,233.60
3	PO NUMBER 6304 STYLE : CBG-27383 LADIES 5 POCKET PANTS	6304	200	4800	\$5.40	\$25,920.00
4	PO NUMBER 6306 STYLE : CFL-27188 LADIES 5 POCKET PANTS	6306	250	6000	\$5.40	\$32,400.00
5	PO NUMBER 6313 STYLE : LRO-28062 LADIES 5 POCKET PANTS	6313	16	384	\$5.40	\$2,073.60
CERTIFIED THAT THE ABOVE GOODS ARE OF PAKISTAN ORIGIN		TOTAL		20904	US \$	\$112,881.60

Naveena Exports Limited

EXHIBIT K

[Handwritten Signature]
N. A. Exports

NAVEENA EXPORTS LTD.

PLOT NO.1 AND 2, SECTOR 28, KORANGI INDUSTRIAL AREA KARACHI - PAKISTAN

COMMERCIAL INVOICE						
1. Shipper/Exporter NAVEENA EXPORTS LTD. PLOT NR.24/1, SECTOR 23, KORANGI INDUSTRIAL AREA, KARACHI -74900, PAKISTAN		INVOICE DATE 21.06.08		INVOICE NO. W012/7116/0608		
		OTHER INFORMATION FORM E NO. SBL-0278879				
2. For account & Risk of Messrs AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018		BY ORDER AND FOR ACOUNT AND RISKS OF: AMBTITION APPAREL INC 512, 7TH AVENUE , 15 FLOOR , NEWYORK, NY 10018				
		COUNTRY OF ORIGIN PAKISTAN				
TRANSPORT DETAILS: BY SEA LOS ANEGELS VESSEL : MOL AFFINTY V /503E		TERMS OF DELIVERY AND PAYMENTS FOB BY SEA AND LC 45 DAYS AFTER SIGHT LC NO. MII835094				
SHIPPING MARKS PARIS BLUE STYLE COLOR PO # SIZE: QUANTITY CARTONS _____ OF _____		NO. AND KINDS OF PACKAGES GOODS DESCRIPTION 1060 CARTONS		GROSS WEIGHT 15787 KGS		VOLUME CBM / M3
				NET WEIGHT 14515 KGS		
S NO.	DESCRIPTION	ORDER NO	CARTO	QUANTITY	UNIT PRICE US \$	AMOUNT US \$
CONTAINER NO: HDMU-618392-9						
1	PO NUMBER 6825 STYLE : CFL-27188 LADIES 5 POCKET PANTS	6825	500	12000	\$5.40	\$64,800.00
2	PO NUMBER 6826 STYLE : CFL-27382 LADIES 5 POCKET PANTS	6826	243	5832	\$5.40	\$31,492.80
3	PO NUMBER 6827 STYLE : CFL-27383 LADIES 5 POCKET PANTS	6827	183	4392	\$5.40	\$23,716.80
4	PO NUMBER 6828 STYLE : CBG-27188 LADIES 5 POCKET PANTS	6828	134	3216	\$5.40	\$17,366.40
CERTIFIED THAT THE ABOVE GOODS ARE OF PAKISTAN ORIGIN		TOTAL		25440	US \$	\$137,376.00

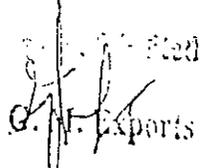
Naveena Exports Ltd

 Naveena Exports

EXHIBIT L

Print | Close Window

Subject: RE: RE FMC BOND

From: "MO Bhatti" <mo.bhatti@nyc.go-trans.com>

Date: Tue, Feb 10, 2009 8:43 am

To: "MO Bhatti" <mo.bhatti@nyc.go-trans.com>, <saqib@naveenagroup.com>, <arr@ravjipc.com>

Cc: <abid.ali@cslpak.com>, <alamdar.hussain@cslpak.com>

Amir

This is in reference to our phone discussion, please find below mail sent to Saqib sahib, for your proceedings.

Kind Regards
MO Bhatti

From: MO Bhatti [mailto:mo.bhatti@nyc.go-trans.com]

Sent: Thursday, February 05, 2009 1:54 PM

To: 'saqib@naveenagroup.com'

Cc: 'abid.ali@cslpak.com'; 'alamdar.hussain@cslpak.com'

Subject: RE FMC BOND

Dear Saqib Sahib

My bond broker did not confirm yet the total value of the bond, mat be later today but as I has promised.

Here is my FMC BOND# 18084F, FMC LICENSE ISSUED BY ' FEDERAL MARITIME COMMISSION, WASHINGTON , DC.20573

Please ask your attorney to proceed and file claim against our bond directly with FMC and FMC will guide and response , how to proceed with the cashing of this bond.

Just for your information, I cannot in cash the bond myself, this must be through your company/Naveena or your appointed attorney,

we also request you to sign release letter/agreement covering GO-Trans and CSL , prepared by my attorney in New York, Once the settlement is done. Please confirm back your acceptance on this.

If you or your attorney needs any additional information, please feel free to ask me and I will cooperate with you.

Kind Regards
MO Bhatti

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EXHIBIT M