

LAW OFFICES OF WEICHENG WANG

WEICHENG WANG**
MUHUA YU*

TURNPIKE PLAZA
197 ROUTE 18, SUITE 309
EAST BRUNSWICK, NJ 08816
TEL. (732) 418-8865
FAX: (732) 418-8879
E-MAIL: wangwesq@aol.com

** MEMBER OF NJ & NY BARS
* MEMBER OF NJ BAR

May 7, 2013

Secretary of the Federal Maritime Commission
Federal Maritime Commission
800 N. Capital Street, NW
Washington, DC 20002

**Re: Seagull Maritime Agencies Private Ltd. v.
GREN Automotive, Inc., et al.
Docket #: 13-03**

RECEIVED
2013 MAY -9 PM 2:51
OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

Dear Secretary of the Federal Maritime Commission:

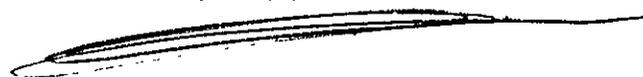
The enclosed original and two (2) copies of the following documents are submitted for filing in the above-referenced matter:

1. Defendant's Answer to Verified Complaint and Affirmative Defenses;
2. Notice of Appearance;
3. Attorney Representation; and
4. Certification of Service.

Kindly file the same and return a filed copy in the enclosed self-stamped envelope. Please do not hesitate to contact me if you have any questions.

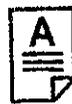
Thank you for your kind assistance in this matter.

Very truly yours,



Weicheng Wang

WW/at
Enclosure
cc: Henry P. Gonzalez, Esq.

 ORIGINAL

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cc: OGC
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BEFORE THE
FEDERAL MARITIME COMMISSION

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM

SEAGULL MARITIME AGENCIES
PRIVATE LTD.,

Complainant,

v.

GREN AUTOMOTIVE INC., CENTRUS
AUTOMOTIVE DISTRIBUTORS, INC.,
and LIU SHAO, individually,

Respondents.

DOCKET NO.: 13-03

**ANSWER TO VERIFIED COMPLAINT
AND AFFIRMATIVE DEFENSES**

Respondents. GREN Automotive Inc., Centrus Automotive Distributors, Inc., and Liu Shao, by way of answer to the allegations contained the Verified Complaint of Seagull Maritime Agencies Private Ltd., hereby states:

Answer

1. Respondents neither admit nor deny the allegations contained in Paragraph 1 of the Verified Complaint and leave for Complainant to prove.
2. Respondents admit the allegations contained in Paragraph 2 of the Verified Complaint.
3. Respondents admit the allegations contained in Paragraph 3 of the Verified Complaint.
4. Respondents admit the allegations contained in Paragraph 4 of the Verified Complaint.
5. Respondents deny the allegations contained in Paragraph 5 of the Verified Complaint.

6. Respondents deny the allegations contained in Paragraph 6 of the Verified Complaint, but admit Centrus was Assignee.
7. Respondents deny the allegations contained in Paragraph 7 of the Verified Complaint.
8. Respondents deny the allegations contained in Paragraph 8 of the Verified Complaint.
9. Respondents deny the allegations contained in Paragraph 9 of the Verified Complaint.
10. Respondents admit the allegations contained in Paragraph 10 of the Verified Complaint, except the allegation "Unknown to Complaint", which Defendants leave for Complainant to prove.
11. Respondents deny the allegations contained in Paragraph 11 of the Verified Complaint.
12. Respondents deny the allegations contained in Paragraph 12 of the Verified Complaint.
13. Respondents deny the allegations contained in Paragraph 13 of the Verified Complaint.
14. Respondents deny the allegations contained in Paragraph 14 of the Verified Complaint.
15. Respondents deny the allegations contained in Paragraph 15 of the Verified Complaint.
16. Respondents deny the allegations contained in Paragraph 16 of the Verified Complaint.

WHEREFORE, Defendant, GREN Automotive Inc., demands Judgment against Complainant, dismissing Complainant's Verified Complaint in its entirety with prejudice and

awarding Respondents attorney fees, cost of suit, and such other and further relief as this Commission may deem just and proper.

Affirmative Defenses

First Affirmative Defense

The Verified Complaint fails to state a cause of action upon which relief can be granted.

Second Affirmative Defense

The damages, if any, were the results of actions by Complainant, or by third parties over which Respondents exercise no control and for which Respondents cannot be held legally responsible.

Third Affirmative Defense

Complainant's claims have been instituted and maintained in bad faith and the action is frivolous, and therefore, Respondents are entitled to attorney's fees, cost of suit, and such other relief as the Commission deems proper.

Fourth Affirmative Defense

Respondents breached no duty to Complainant either express or implied.

Fifth Affirmative Defense

Complainant's claims must be dismissed because they are barred by the appropriate statute of fraud.

Sixth Affirmative Defense

Complainant is barred from recovery by operation of the law of estoppel.

Seventh Affirmative Defense

Complainant is barred from recovery by operation of the law of waiver.

Eighth Affirmative Defense

Complainant is barred from recovery by operation of the doctrine of laches.

Ninth Affirmative Defense

Complainant is barred from recovery for failure to mitigate damages.

Tenth Affirmative Defense

Complainant is barred from recovery by the doctrine of unclean hands.

Eleventh Affirmative Defense

Complainant has not suffered any damages as a result of the alleged actions of Respondents.

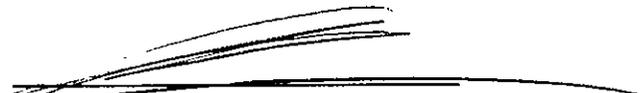
Twelfth Affirmative Defense

Any award to Complainant in this action would constitute unjust enrichment.

Thirteenth Affirmative Defense

Complainant is barred from recovery by the appropriate statute of limitations.

Dated: May 7, 2013


Weicheng Wang
Law Offices of Weicheng Wang
197 Route 18, Suite 309
East Brunswick, NJ 08816
Phone: (732) 418-8865
Fax: (732) 418-8879
wangwesq@aol.com
Attorney for the Respondents
GREN Automotive Inc., Centrus
Automotive Distributors, Inc., and Liu Shao

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NOTICE OF APPEARANCE

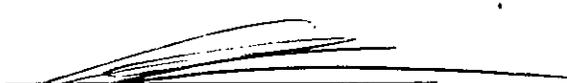
Please enter my appearance in this proceeding as counsel for Respondents.

I request to be informed of service of the administrative law judge's initial or
recommended decision and of the Commission's decision in this proceeding by:

Telephone (In the event that I am not available when you call, appropriate advice left
with my office will suffice.)

Facsimile transmission

Electronic mail


Weicheng Wang
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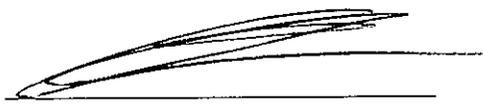
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DOCKET NO.: 13-03

ATTORNEY REPRESENTATION

This is to represent that the undersigned is admitted to practice law in the State of New Jersey and my attorney license is in good standing.


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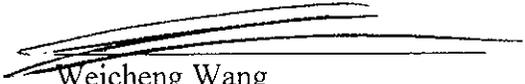
CERTIFICATION OF SERVICE

Weicheng Wang, of full age, does hereby certify as follows:

1. The within Answer to Verified Complaint and Affirmative Defenses has this day been mailed by UPS Next Day Service to the Secretary of the Federal Maritime Commission, 800 N. Capital Street, NW, Washington, DC, 20002.
2. The within Answer to Verified Complaint and Affirmative Defenses has this day been mailed by USPS First Class Mail and USPS Certified Mail with Return Receipt to Henry P. Gonzalez, Esq., Gonzalez del Valle Law, 1250 Connecticut Avenue NW, Suite 200, Washington, DC 20036.

I certify that the above statements made by me are true. I am aware that if any of the foregoing statements provided by me is willfully false, I shall be subject to punishment.

Dated: May 7, 2013



Weicheng Wang
Attorney for Respondents
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