

FEDERAL MARITIME COMMISSION

USL AUTO EXPORTING INC.,

COMPLAINANT,

v.

Docket No. 23-13

EASY SHIPPING CORPORATION

RESPONDENT.

COMPLAINANT'S MOTION TO COMPEL RESPONDENT TO COMMUNICATE

Introduction:

Pursuant to the provisions outlined in 46 CFR §502.70(a), USL AUTO EXPORTING INC. (hereinafter referred to as "Complainant") respectfully submits this Motion to Compel Communication against EASY SHIPPING CORPORATION (hereinafter referred to as "Respondent"). This motion is predicated on the urgent need for effective and directive communication, crucial for the orderly progression of the ongoing proceedings.

Statement of the Motion:

The Complainant hereby moves the Commission to compel the Respondent to communicate directly and exclusively with the Complainant's designated email address: ageneral.manager@uslautoexporting.com, and to cease all communication to email address arwini.khalid@gmail.com. This request is supported by the enclosed email correspondence, which includes copies to the honorable Judges.

Grounds for the Motion:

1. Non-Compliance with Preferred Communication Channel: Respondent has continued to send emails to an outdated email address (arwini.khalid@gmail.com), despite being

informed of the official communication channel (ageneral.manager@uslautoexporting.com). This practice hinders effective communication and disregards the Complainant's specified preference.

2. Adherence to Commission's Directive: Commission has directed both parties to collaborate on a joint status report within the next 15 days. Proper adherence to this directive is only feasible through communication to the designated representative email of the Complainant.
3. Upcoming Preliminary Conference: The upcoming preliminary conference with the Commission's Office of Consumer Affairs and Dispute Resolution Services (CADRS) necessitates clear and directed communication. The Respondent's current practice of sending emails to an unauthorized address could lead to miscommunication and procedural delays.

Conclusion: In light of the above, the Complainant respectfully requests the Commission to enforce this Motion to Compel, thereby mandating the Respondent to adhere to the specified communication protocol. This measure is critical to ensure transparency, efficiency, and compliance with the Commission's directives, thereby facilitating a fair and orderly progression of the case.

DATED: December 26, 2023

Respectfully submitted,

USL AUTO EXPORTING INC.

By: s/ANIS HOUSSEIN

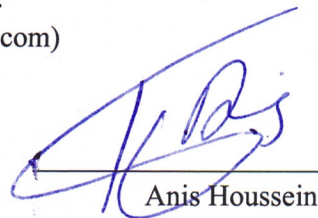
ANIS HOUSSEIN

Vice President for COMPLAINANT
Address: 84 Kensington Dr.,
PISCATAWAY, New Jersey 08854
Tel.: (862) 338-0889
E:general.manager@uslautoexporting.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of December 2023, a true and correct copy of the foregoing Notice of Appearance was served via electronic mail on:

EASY SHIPPING CORPORATION (easyshippingcorp@gmail.com)



Anis Houssein

EXHIBIT - A

23-13 - USL Auto Exporting Inc., v. Easy Shipping Corporation

USL Auto Exporting INC <general.manager@uslautoexporting.com>

Tue 12/19/2023 3:50 PM

To: Judges <Judges@FMC.gov>; Secretary <secretary@FMC.gov>

Cc: Easy Shipping Corporation <easyshippingcorp@gmail.com>

To the Honorable Judges,

I recently reviewed the documents in the Reading Room and noticed that the Respondent has submitted a Notice of Appearance. Regrettably, I was not notified of this filing. I kindly request that, in the future, all necessary documents and proceedings be duly served to me to maintain transparency and adherence to legal protocols.

I appreciate your attention to this matter and thank you in advance for ensuring proper communication in subsequent proceedings.

Anis Houssein

Vice President

Email: general.manager@uslautoexporting.com

Tel. (862) 338 - 0889

2721 WET STONE WAY, UNIT 206

CHARLOTTE, NORTH CAROLINA 28208

EXHIBIT - B

23-13 - Remember to serve me the answer!**USL Auto Exporting INC <general.manager@uslautoexporting.com>**

Thu 12/21/2023 1:57 PM

To: Easy Shipping Corporation <easyshippingcorp@gmail.com>

Cc: Judges <Judges@FMC.gov>; Secretary <secretary@FMC.gov>

To Easy Shipping Corporation,

Please remember to serve me the answer!

I am writing to remind you of the recent developments in our ongoing case, as acknowledged by the commission. On December 6, 2023, the commission accepted my Notice of Appearance, officially recognizing me in these proceedings.

I would like to emphasize the importance of direct communication in this matter. Please ensure that all responses and relevant documents are served directly to me. As per the commission's guidelines, documents should be filed via email, with copies sent to both the opposing party and the presiding judge at judges@fmc.gov. It is also mandatory to inform the commission if there are any changes to your service address.

Furthermore, in compliance with the commission's directive, we are required to collaborate on a joint status report within the next 15 days. Additionally, our participation in a preliminary conference with the Commission's Office of Consumer Affairs and Dispute Resolution Services (CADRS) is scheduled. These steps are vital for the progression of our case.

Lastly, I kindly request that all future correspondences be sent directly to my email address, rather than to the president's email. Failure to do so will leave me with no choice but to file a motion to compel compliance with these communication guidelines.

Thank you for your attention to these matters. I look forward to your prompt cooperation.

Sincerely,

Anis Houssein*Vice President**Email: general.manager@uslautoexporting.com**Tel. (862) 338 - 0889**2721 WET STONE WAY, UNIT 206**CHARLOTTE, NORTH CAROLINA 28208*