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June 19, 2024

BY .ECF

The Honorable James K. Bredar
United States District Judge
District of Maryland
101 West Lombard Street
Chambers 5A
Baltimore, Maryland 21201

Re: *IMO Grace Ocean Private Ltd., et al.*
Case No. 24-00941-JKB (D. Md.)

Dear Judge Bredar,

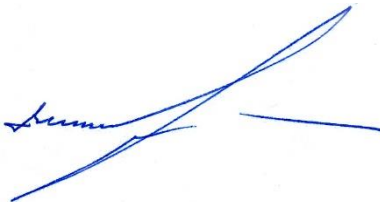
Claimant, the Mayor and City Council of Baltimore (“Baltimore” or “City of Baltimore”), respectfully writes to provide an update to the Court, and to withdraw its request for an emergency status hearing in this matter.

As Your Honor knows from our previous letter, ECF 44, which was filed as a request for an emergency status hearing, counsel for Grace Ocean Private Ltd. and Synergy Marine PTE Ltd. (collectively, the “Vessel Interests”) informed us on the morning of June 18 of the imminent departure of certain crew members who were present on the M/V Dali at the time of the allision central to this action. The City of Baltimore requested the Court’s intervention because of a concern that such departure would prevent Baltimore, and other Claimants, from obtaining crucial discovery from these witnesses despite previous guarantees from the Vessel Interests that, prior to such crew departures, the Vessel Interests would provide Claimants with “as much notice as possible so that arrangements can be made to preserve their testimony.” (ECF 43-1).

Since the filing of our June 18, 2024 letter, counsel for all current Claimants met and conferred, and approached counsel for the Vessel Interests with a compromise proposal to resolve the dispute and avoid the intervention of the Court. That compromise, which is attached as Exhibit A to this letter and to which the Vessel Interests have agreed, includes a guarantee that the Vessel Interests will produce the witnesses in question for deposition during the discovery phase of this case.

With this agreement in place, the City of Baltimore is satisfied that the Parties no longer require the Court's intervention to resolve the dispute. The City of Baltimore accordingly respectfully requests to withdraw its June 18, 2024 request for an emergency status hearing.

Respectfully submitted,



Adam J. Levitt
DiCello Levitt LLP

/s/ Sara Gross
Sara Gross
Chief
Affirmative Litigation Division
Baltimore City Department of Law

/s/ Jeffrey P. Goodman
Jeffrey P. Goodman
Saltz Mongeluzzi
Bendesky PC

Enclosure

cc: All counsel of record (by ECF)