

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager
of the M/V DALI,

for Exoneration from or Limitation of
Liability.

Docket No. _____

IN ADMIRALTY

INTERIM STIPULATION FOR VALUE AND STIPULATION FOR COSTS

WHEREAS, Petitioners, GRACE OCEAN PRIVATE LIMITED (“Owner”), as owner of the M/V DALI (the “Vessel”), and SYNERGY MARINE PTE LTD, as manager of the Vessel, have filed a Petition in the above-captioned proceeding for exoneration from or limitation of liability in respect of claims and damages incurred during or arising out of the Vessel’s voyage commencing on or about March 26, 2024 from Baltimore, Maryland bound for Colombo, Sri Lanka, with an ultimate destination of Yantian, China, and her allision with the Francis Scott Key Bridge in Baltimore (the “Casualty”);

WHEREAS, in the above-captioned proceeding, Petitioners pray for the Court to (1) issue an Order directing the issuance of a notice to all persons asserting claims with respect to which the Petition seeks exoneration from or limitation of liability, admonishing them to file their respective claims with the Clerk of this Court and to serve a copy of such claims upon Petitioners’ attorneys on or before a date to be named in the notice; and (2) issue an order enjoining the commencement

of or further prosecution of any claims or causes of action against Petitioners except in the above-captioned action;

WHEREAS, Petitioners desire to prevent the further prosecution of any and all proceedings already instituted against them and the commencement or prosecution hereafter of any and all suits, actions, or legal proceedings arising out of the Casualty except in this action;

WHEREAS, Petitioners desire to provide an interim stipulation for value and security for claims pending such due appraisal of the amount or value of Owner's interest in the Vessel and its pending freight in connection with the voyage, with interest at the rate of 6% *per annum* from the date of said security, or whenever the Court shall so order;

WHEREAS, Rule F(1) of the Supplemental Admiralty Rules and Local Admiralty Rule (f)(1) require Petitioners to pay security for costs awarded by the Court in the amount of \$1,000, plus interest at the rate of 6% *per annum* thereon.

NOW, THEREFORE, in consideration of the premises, Stipulator, The Britannia Steam Ship Insurance Association Europe, an entity organized under the laws of England and Wales, hereby undertakes in the sum of \$43,671,000, with interest at the rate of 6% *per annum* thereon from April 1, 2024, that if judgment is awarded against either or both Petitioners, such judgment may be entered against both Petitioner(s) and Stipulator for the amount not exceeding the aforesaid sum and interest.

Stipulator, The Britannia Steam Ship Insurance Association Europe, hereby submits itself to the jurisdiction of this Court in connection with this Stipulation and agrees to abide by all orders and decrees of the Court, intermediate or final, and to pay the amount awarded by the final judgment or decree rendered by this Court. If the final judgement or decree is appealed, Stipulator agrees to pay up to the principal amount of this undertaking, with interest at the rate of 6% *per*

annum, unless Petitioner(s) pay such judgment or decree or, in the meantime, the amount or value of Owner's interest in the Vessel and its pending freight in connection with the voyage shall have been paid into Court by Petitioner(s) or a subsequent approved Stipulation for Value thereof shall have been given, in which case this Stipulation shall be void.

Dated: April 1, 2024
Baltimore, Maryland

The Britannia Steam Ship Insurance
Association Europe

By: BLANK ROME LLP

/s/
William R. Bennett, III, Esquire
As attorney-in-fact for the above limited
purpose only
(signed copy of document bearing signature
of William R. Bennett, III is being
maintained in office of Robert B. Hopkins)