IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

In the Matter of the Petition of	
GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,	Civil Action No. 1:24-cv-00941
and)	IN ADMIRALTY
SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,	
for Exoneration from or Limitation of Liability.	

JOINT NOTICE OF SETTLEMENT

Petitioners Grace Ocean Private Limited and Synergy Marine Pte Ltd ("Petitioners") and Claimant United States of America, by their respective undersigned counsel, hereby notify the Court that they have reached a settlement in this case. Petitioners and the United States of America, therefore, respectfully request that the Court dismiss the United States of America's Claim against Petitioners (ECF No. 82) in accordance with the attached proposed Local Rule 111 Settlement Order.

Dated: October 24, 2024.

(Signature Pages Follow)

Respectfully submitted,

FOR CLAIMANT UNITED STATES OF AMERICA

BRIAN M. BOYNTON Principal Deputy Assistant Attorney General

Civil Division

RODNEY PATTON

Director

MICHAEL A. DILAURO

Assistant Director (Admiralty)

MICHELLE T. DELEMARRE

Senior Admiralty Counsel

THOMAS-M. BROWN (Bar No. 30334)

Trial Attorney

JESSICA G. SULLIVAN

Senior Trial Counsel

JEANNE L. AMY

GUYER S. BOGEN

LAINE M. GOODHUE

Trial Attorneys

United States Department of Justice

Torts Branch, Civil Division

P.O. Box 14271

Washington, DC 20044-4271

Tel: (202) 616-4036 Fax: (202) 616-4314

 $E\text{-}mail: \ thomas.m.brown@usdoj.gov$

United States Department of Justice

Civil Division

EREK L. BARRON United States Attorney

KELLY M. MARZULLO (Bar No. 28036)

Assistant United States Attorney 36 South Charles Street, 4th Floor Baltimore, Maryland 21201

Tel: (410) 209-4956

Fax: (410) 762-5842

E-mail: kelly.marzullo@usdoj.gov

FOR PETITIONERS

/s/ Robert B. Hopkins

DUANE MORRIS LLP Robert B. Hopkins (Bar No. 06017) rbhopkins@duanemorris.com Laurie G. Furshman (Bar No. 29604) Lgfurshman@duanemorris.com 100 International Drive, Suite 700 Baltimore, MD 21202 (410) 949-2900

BLANK ROME LLP

William R. Bennett III (pro hac vice) William.Bennett@blankrome.com Thomas H. Belknap, Jr. (pro hac vice) Thomas.Belknap@blankrome.com 1271 Avenue of the Americas New York, NY 10020 (212) 885-5000

Kierstan L. Carlson (*pro hac vice*) Kierstan.Carlson@blankrome.com 1825 Eye St. NW Washington, DC 20006 202-420-2200

Counsel for Petitioners