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Via ECF

September 4, 2024

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

Re: *In re Grace Ocean Private Limited and Synergy Marine Pte Ltd*
D. Md. Docket No. 1:24-cv-00941
DJ No.: 61-35-475

Dear Judge Bredar,

The United States of America (“United States”) respectfully writes to inform the Court that it, along with other claimants and prospective claimants, has negotiated with the Petitioners to perform inspections and testing on the M/V DALI related to the subject Limitation Action. The inspections and testing are scheduled to begin tomorrow, September 5th and may run through September 14, 2024 if necessary. The parties are working diligently to establish a final protocol, and a meet-and-confer has been scheduled for this evening in anticipation of work beginning tomorrow morning.

This schedule is driven by Petitioners having informed claimants that they intend to sail the DALI from its present berth in Norfolk, Virginia on or about September 17, 2024, and directly on to China. This is before the monition period closes on September 24th. *See* ECF No. 8. Under these circumstances, the parties have been working in good faith to reach an agreement on inspections and testing to be completed before the vessel departs for international waters.

The United States is committed to working collaboratively with Petitioners to avoid or work through any disputes in the days ahead. That said, given the complexity of the work to be done, and the large number of parties involved, there is a possibility that disagreements may arise. Should any such disagreements require the Court’s attention,

we will promptly inform the Court and seek guidance to ensure that the inspections and testing proceed efficiently and without detriment to claimants' rights.

We write now so that the Court could have some context in the event that the parties need to contact chambers in the coming days. With that context in mind, we extend our appreciation to Petitioners for their cooperation and to the Court for its attention.

Respectfully submitted,



Laine M. Goodhue

cc: All counsel of record (by ECF)