MEMO ENDORSED

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC#:

DATE FILED: November 25, 2024

ATA FREIGHT LINE, LTD.,

Plaintiff,

23-cv- 08053 (ALC)

IN ADMIRALTY

STIPULATION AND ORDER OF CONSENT TO ENTRY OF JUDGMENT

- against -

ARROGANT STEEL, LLC: GOLDEN VOYAGE AMERICA, LLC, and GOLDEN VOYAGE PLASTICS, INC.

-----X

Defendants.

IT IS HEREBY STIPULATED AND AGREED between all of the parties to this Action as follows:

WHEREAS, Plaintiff, ATA Freight Line, Ltd. acted as a shipper and exporter for Defendants, Arrogant Steel, LLC, and Golden Voyage America, LLC, for certain nylon material for shipment to Hong Kong; and,

WHEREAS, Plaintiff incurred additional expenses by reason of the rejection of the goods in Hong Kong and Defendants failure to procure alternative arrangements to divert the shipments and cover all demurrage, storage and export charges/additional freight; and

WHEREAS Defendants Arrogant Steel, LLC and Golden Voyage America LLC have no valid defenses to the Action.

NOW, THEREFORE, it is agreed that:

1. Defendants Arrogant Steel, LLC and Golden Voyage America LLC consent to the entry of judgment in the amount of \$111,652.89, plus costs.

2. Plaintiff agrees to discontinue the Action as against Golden Voyage Plastics, Inc., without prejudice and without costs to either side.

Dated: Garden City, New York July 3, 2024

Freehill, Hogan & Mahar LLP

Peter J. Gutowski

Attorneys for Plaintiff 80 Pine Street, 25th Floor New York, NY 10005-1750 (212) 425-1900 gutowski@freehill.com Law Office of Robert S. Powers

Robert S. Powers

Attorney for the Defendants 304 Kilburn Road South Garden City, New York 11530 (646) 660-2778 rpowers435@gmail.com

So Ordered

SO ORDERED:

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

> November 25, 2024 New York, NY