

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

**MOTION TO ACCEPT INTERIM STIPULATION FOR VALUE AND STIPULATION
FOR COSTS AND FOR THE ENTRY OF RESTRAINING ORDER AND ORDER FOR
ISSUANCE OF NOTICE**

Petitioners GRACE OCEAN PRIVATE LIMITED (“Owner”), owner of the M/V DALI (the “Vessel”), and SYNERGY MARINE PTE LTD, manager of the Vessel, by their undersigned attorneys, move the Court to enter an Order accepting the Interim Stipulation for Value and Stipulation for Costs proffered by Petitioners, and to enter a Restraining Order and Order that Notice of the commencement of this proceeding be issued, all as prayed for in the Petition herein.

/s/

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Of Counsel for Synergy Marine Pte Ltd

*Applications for admission *pro hac vice*
forthcoming

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION
TO ACCEPT INTERIM STIPULATION FOR VALUE AND STIPULATION
FOR COSTS AND FOR THE ENTRY OF RESTRAINING ORDER
AND ORDER FOR ISSUANCE OF NOTICE**

Petitioners GRACE OCEAN PRIVATE LIMITED (“Owner”), owner of the M/V DALI (the “Vessel”), and SYNERGY MARINE PTE LTD, manager of the Vessel, by their undersigned attorneys, hereby submit this Memorandum of Points and Authorities in support of their Motion to Accept Interim Stipulation for Value and Stipulation for Costs and for the Entry of Restraining Order and Order for Issuance of Notice.

POINTS OF AUTHORITIES

Rule F, Supplemental Rules of the Federal Rules of Civil Procedure for Certain Admiralty and Maritime Claims.

United States District Court for the District of Maryland Local Admiralty Rule (F).

/s/

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IN ADMIRALTY

**ORDER ALLOWING INTERIM STIPULATION FOR VALUE
AND STIPULATION FOR COSTS**

AND NOW, this ____ day of _____, 2024, upon consideration of the Petition for Exoneration from or Limitation of Liability (“Petition”), and the supporting declaration and proposed orders submitted by Petitioners,

It is hereby **ORDERED** and **DECREED** that:

1. Petitioners may file an Interim Stipulation for Value and Stipulation for Costs in the amount of \$43,671,000, with interest at the rate of 6% *per annum* thereon from April 1, 2024, which amount includes security for costs in the amount of \$1,000 pursuant to Local Admiralty Rule (f) of the Court; and

2. Any claimant in or party to this proceeding may apply by motion to have the amount of such Stipulation increased or diminished as the case may be on the filing of any report of due appraisalment of Petitioner GRACE OCEAN PRIVATE LIMITED’s interest in the M/V DALI

(the “Vessel”) ordered by the Court, or on the filing of any report of due appraisalment of GRACE OCEAN PRIVATE LIMITED’s interest in the Vessel ordered by the Court, or on the ultimate determination of the Court on exceptions to any such appraisalment report.

Judge, United States District Court for the
District of Maryland

cc: all counsel of record

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

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Docket No. _____

IN ADMIRALTY

**RESTRAINING ORDER AND ORDER
FOR ISSUANCE OF NOTICE THAT CLAIMS BE FILED**

AND NOW, this ____ day of _____, 2024, upon consideration of the Petition for Exoneration from or Limitation of Liability (“Petition”), and the supporting declaration and proposed orders submitted by Petitioners,

It is hereby **ORDERED** and **DECREED** that:

1. Petitioners shall issue 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, located at the United States Court House, 101 West Lombard Street, Baltimore, MD 21201, and to serve a copy of such claims upon Petitioners’ attorneys on or before September 24, 2024;

2. In accordance with Rule F of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure and Local Admiralty Rule (c)(2),

Petitioners shall provide the required notice by publication in the Baltimore Sun, the Daily Record, and the Washington Post once in each week for four (4) successive weeks before the return date of said notice; and

3. No later than the date of the second publication, Petitioners shall mail a copy of said notice to every person known to have any claim against Petitioners or the M/V DALI (the "Vessel"), or to their attorneys, if known. With respect to death claims, such notice shall be provided to the decedent at his last known address, if known, and also to any person who has made a claim on account of such death.

It is further hereby **ORDERED** and **DECREED** that:

4. The commencement of or further prosecution of any claims or causes of action against Petitioners and/or the Vessel arising out of the Casualty (as defined in the Petition) except in this action is hereby enjoined and/or stayed and/or restrained until the hearing and determination of this proceeding.

IT IS SO ORDERED.

Judge, United States District Court for the
District of Maryland

cc: all counsel of record

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IN ADMIRALTY

**NOTICE TO CLAIMANTS OF PETITION FOR EXONERATION FROM OR
LIMITATION OF LIABILITY**

Notice is hereby given that GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI and SYNERGY MARINE PTE LTD, as Manager of the M/V DALI (the “Vessel”), have filed a Petition pursuant to 46 U.S.C. §§ 30501, *et. seq.*, claiming the right to exoneration from or limitation of liability for all claims and damage 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”).

All persons having such claims must file them with the Clerk of this Court at the United States Court House, 101 West Lombard Street, Baltimore, MD 21201 no later than September 24, 2024. Such claims must be served upon Petitioners’ attorneys, BLANK ROME LLP and DUANE MORRIS LLP, contact information for whom is listed below. Personal attendance at the Court is

not required, but failure to file claims with the Clerk and failure to serve claims upon Petitioners' attorneys will result in default.

Any claimant who files a claim with this Court and wishes to contest the allegations in the Petition must file an answer to said Petition and serve such answer upon Petitioners' attorneys.

Dated: Baltimore, Maryland
April __, 2024

Clerk of the Court
U.S. District Court for the District of
Maryland

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