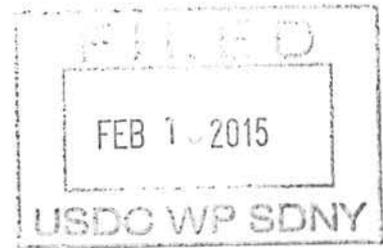


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(212) 286-0225
Attorneys for Plaintiff



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

15 CV 1187

-----X
CARBAMERICAS, INC.

15 Civ.

Plaintiff,

JUDGE OETKEN

- against -

COMPLAINT

(JPO)

MEDITERRANEAN SHIPPING COMPANY S.A.
and KUEHNE & NAGEL, INC. d/b/a BLUE
ANCHOR AMERICA LINE,

Defendant.
-----X

Plaintiff, CARBAMERICAS, INC., by and through its attorneys, Casey & Barnett LLC,
as and for its Complaint, alleges upon information and belief as follows:

JURISDICTION

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. Jurisdiction is predicated upon 28 U.S.C. §1333.
2. Venue in this district is predicated on the jurisdiction clause contained in the each of the defendant's bill of lading, which provides for jurisdiction of all claims under the respective bills of lading to be subject to the exclusive jurisdiction of the United States District Court for the Southern District of New York.

PARTIES

3. At all material times, Carbamericas, Inc., (hereinafter "Carbamericas" or "Plaintiff") was and is a corporation organized and existing by virtue of the laws of a foreign