

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 35807

**OAKLAND GLOBAL RAIL ENTERPRISE, LLC – ACQUISITION AND OPERATING
EXEMPTION – LINES OF RAILROAD WITHIN THE PORT OF OAKLAND,
CALIFORNIA**

ENTERED
Office of Proceedings
February 27, 2014
Part of
Public Record

MOTION FOR EXTENSION OF TIME

Oakland Global Rail Enterprise, LLC (“OGRE”) hereby files this motion for a brief extension of the time to respond to the decision served by the Director of the Surface Transportation Board's ("Board") Office of Proceedings in this docket on February 21, 2014. In that decision, the Director of the Office of Proceedings directed OGRE to file, by March 10, 2014, supplemental information describing, in detail, whether the activities described in OGRE's petition included construction of a line of railroad subject to the Board's licensing authority and, if so, why OGRE has not sought Board authority for such construction.

OGRE respectfully requests that good cause exists for a modest two week extension of the date for submitting a response. 49 C.F.R. §1104.7 (b). Specifically, OGRE and its counsel have begun to collect and review the factual information relevant to the request. However, due to the schedules and prior commitments of key persons involved in such collection and review, OGRE believes that finalizing such collection and review, and the preparation of the detailed response that has been requested, will take longer than the time allotted by the Director's decision. Moreover, no party would be prejudiced by granting the requested extension, since the

transactions described in OGRE's petition will likely not be consummated until January, 2015, and the rail construction referenced in the OGRE's petition has not yet begun.

Accordingly, OGRE asks that the Board grant this motion to extend, to March 24, 2014, the date for filing a response to the February 21, 2014 decision.

Respectfully submitted,



Edward D. Greenberg
Thomas W. Wilcox
GKG Law, P.C.
Canal Square
1054 Thirty-First Street, N.W.
Washington, D.C. 20007
Telephone: 202-342-5277
Facsimile: 202-342-2311

Attorneys for
Oakland Global Rail Enterprise, LLC