

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
April 5, 2016
Part of
Public Record

FINANCE DOCKET NO. 36014
INGREDION, INC. - PETITION FOR DECLARATORY ORDER

**MOTION FOR EXTENSION OF TIME TO FILE MOTION TO STAY OR OTHERWISE
RESPOND TO INGREDION, INC.'S PETITION FOR DECLARATORY ORDER**

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Dated: April 4, 2016

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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Coulas Viking Partners (“Viking Partners”), a party seeking to be a party of record that intends to file a response to Ingridion, Inc.’s (“Ingridion”) Petition for Declaratory Order, respectfully moves pursuant to 49 C.F.R. § 1104.7 for additional time to move to stay the proceedings or otherwise respond to the filing of Ingridion dated March 24, 2016.¹ In support thereof, Viking Partners states as follows:

1. Ingridion’s Petition was filed with the Surface Transportation Board (“STB”) on March 24, 2016. The Petition seeks the STB’s determination of a case filed by Viking Partners that has been pending in Illinois state court since December 2013 (“State Court Action”). Viking Partner’s response to the Petition is due on April 25, 2016, pursuant to 49 C.F.R. § 1104.13.
2. On the same day Ingridion filed the Petition with the STB, it also removed the State Court Action to the United States District Court for the Northern District of Illinois.²
3. Viking Partners disputes Ingridion’s basis for removal to federal court. Viking Partners’ motion to remand is due on April 25, 2016.
4. Viking Partners also disputes the jurisdiction of the STB to determine the Illinois state common law causes of action raised in the State Court Action.

¹ *Ingridion Inc. ’s Petition for Declaratory Order*, dated March 24, 2016 (“Petition”).

² *See Coulas Viking Partners v The Belt Railway Company of Chicago, et. al.*, Case No. 16-cv-3583.

5. Accordingly, and to allow Viking Partners sufficient time to respond to the allegations in the Petition, Viking Partners hereby requests an extension of time to file its Motion to Stay, or otherwise respond to Ingredion's Petition to and until April 29, 2016. Counsel for Ingredion, Inc. has consented to the requested extension.

For the foregoing reasons, Viking Partners respectfully requests to extend the time for it to move to stay or otherwise respond to Ingredion's Petition to and until April 29, 2016.

Respectfully submitted,



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Counsel for Coulas Viking Partners

CERTIFICATE OF SERVICE

I, Katharine Heitman, hereby certify that on this 4th day of April, 2016, a copy of the foregoing Motion for Extension of Time to File Motion to Stay Or Otherwise Respond to Ingredion, Inc.'s Petition For Declaratory Order was served by email to Karyn A. Booth, Karyn.Booth@ThompsonHine.com, Counsel for Ingredion, Inc. A copy of the foregoing was also served FedEx Overnight, upon the following:

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