

The procedural schedule proposed by CSXT and M&G is the product of a compromise between the two parties based on their respective best current assessments of the time needed for each of the described filing events. The parties reserve their respective rights to seek additional time should it become necessary to do so and recognize that any such further requests would require the filing of an appropriate motion to which the other party would have the opportunity to reply. M&G and CSXT further emphasize that they do not intend this motion to affect their pending motions concerning the Board's initial market dominance decision issued on September 27, 2012, and neither withdraws its pending motion. See CSXT's "Motion to Hold the Rate Reasonableness Phase of This Case in Abeyance Pending Resolution of Central Issues" (filed December 4, 2012) ("CSXT Abeyance Motion"); and M&G's "Petition for Reconsideration" (filed October 17, 2012) ("M&G Reconsideration Petition").

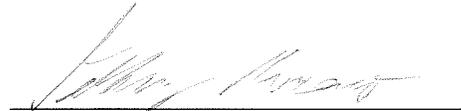
The procedural schedule proposed herein is based upon the service date of the Board's final market dominance decision (including the Board's disposition of the CSXT Abeyance Motion and the M&G Reconsideration Petition) in this proceeding. The specific dates for each event can be calculated once the date of the Board's final market dominance decision is known, though such dates may require minor adjustments at that time.

WHEREFORE, for the foregoing reasons, M&G and CSXT respectfully request that the Board adopt the procedural schedule in Exhibit A.

Respectfully submitted,



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EXHIBIT A

Proposed procedural schedule

| Day | Event |
|------------|------------------------------------------------|
| 0 | Board issues final market dominance decision |
| 60 (+60) | CSXT completes updating of discovery responses |
| 165 (+105) | M&G Opening Evidence |
| 285 (+120) | CSXT Reply Evidence |
| 360 (+75) | M&G Rebuttal Evidence |
| 390 (+30) | Final Briefs |