

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

238268

**NORTH AMERICA FREIGHT CAR)
ASSOCIATION; AMERICAN FUEL &)
PETROCHEMICALS MANUFACTURERS;)
THE CHLORINE INSTITUTE; THE)
FERTILIZER INSTITUTE; AMERICAN)
CHEMISTRY COUNCIL; ETHANOL)
PRODUCTS, LLC D/B/A POET ETHANOL)
PRODUCTS; POET NUTRITION, INC.; and)
CARGILL INCORPORATED)
)
)
vs.)
)
**UNION PACIFIC RAILROAD)
COMPANY)
)
)****

ENTERED
Office of Proceedings
April 27, 2015
Part of
Public Record

Docket No. NOR 42144

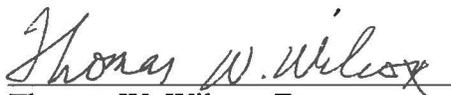
UNOPPOSED MOTION FOR EXTENSION OF TIME

The Complainants¹ in this proceeding respectfully submit this motion to extend the time period for filing their Reply to Defendant Union Pacific Railroad Company's ("UP") Motion to Dismiss Complaint or to Make Complaint More Definite. Specifically, Complainants seek an extension of the deadline for filing their Reply from the current date of May 11, 2015 pursuant to the Board's procedural rules, to June 1, 2015. Complainants state that the extension is necessary because the process of preparing and finalizing a response to the Motion will be more time consuming and complicated than it would be in a typical case due to the numerous Complainants and co-counsel involved in this case. This extension also accounts for the anticipated

¹ North America Freight Car Association ("NAFCA") American Fuel & Petrochemicals Manufacturers ("AFPM") The Chlorine Institute, Inc. ("CI") The Fertilizer Institute ("TFI"); the American Chemistry Council ("ACC") Ethanol Products, LLC d/b/a. POET Ethanol Products ("Poet Ethanol Products"); POET Nutrition, Inc., ("Poet Nutrition"); and Cargill Incorporated ("Cargill").

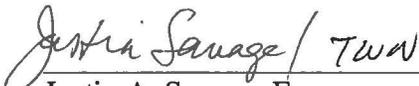
unavailability of involved client representatives and counsel during the upcoming Memorial Day holiday period. Counsel for Complainants advise the Board that they consulted with counsel for UP prior to filing this motion, and UP counsel has authorized Complainants' counsel to represent that UP does not oppose the requested extension. Complainants accordingly request that the Board extend the date for responding to Defendant's Motion to June 1, 2015.

Respectfully submitted,



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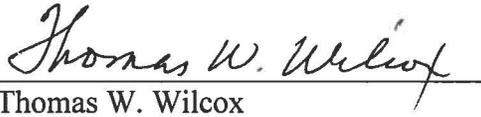
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CERTIFICATE OF SERVICE

I do hereby certify that on this 27th day of April, 2015, I have served a copy of the foregoing Unopposed Motion for Extension of Time via electronic mail and regular mail to counsel for Defendant at the following address:

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