

EXPEDITED ACTION REQUESTED

235535
ENTERED

Office of Proceedings
February 27, 2014
Part of
Public Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ST. LAWRENCE & ATLANTIC RAILROAD)
COMPANY -- DISCONTINUANCE OF)
SERVICE EXEMPTION -- IN)
ANDROSCOGGIN AND CUMBERLAND)
COUNTIES, MAINE)

Docket No. AB-1117X

**MOTION OF B&G FOODS NORTH AMERICA, INC. FOR EXTENSION
OF TIME TO SUBMIT AN OFFER OF FINANCIAL ASSISTANCE**

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*Attorney for
B&G Foods North America, Inc.*

Dated: February 27, 2014

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**MOTION OF B&G FOODS NORTH AMERICA, INC. FOR EXTENSION
OF TIME TO SUBMIT AN OFFER OF FINANCIAL ASSISTANCE**

B&G Foods North America, Inc. (“B&G”), respectfully moves for an extension of time to submit an Offer of Financial Assistance (“OFA”) to subsidize continued rail service in the above-captioned proceeding until fourteen (14) days after B&G receives the OFA information that it has previously requested from St. Lawrence & Atlantic Railroad Company (“SLA”). B&G is authorized to state that SLA concurs in this motion. In further support of this motion, B&G respectfully states as follows:

The Surface Transportation Board (“Board” or “STB”) granted SLA’s petition for exemption for discontinuance of service in the above-captioned docket, over B&G’s protest, in an order served February 25, 2014. The Board’s order states at p. 5 that OFAs to subsidize continued rail service are due “by March 7, 2014, subject to time extensions authorized under 49 C.F.R. § 1152.27(c)(1)(i)(C).”

B&G had previously requested information needed for preparing on OFA (which information was not part of SLA’s petition), and the parties had agreed that SLA could defer compiling the requested information, contingent upon B&G’s having

fourteen days to submit an OFA after it received the information. This motion is being submitted in furtherance of the parties' agreement.

Expedited action is respectfully submitted because B&G's OFA would otherwise be due on March 7, 2014, and B&G cannot submit an OFA until it has received the information it has requested from SLA.

As noted above, SLA concurs in this motion.

Accordingly, B&G respectfully requests that the period for submitting OFAs to subsidize continued rail service be extended until fourteen days after SLA has provided the OFA information that B&G has requested. The parties will undertake to advise the Board once the information has been provided.

Respectfully submitted,

/s/ Robert D. Rosenberg
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1224 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 347-7170

*Attorney for
B&G Foods North America, Inc.*

Dated: February 27, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of February, 2014, caused copies
of the foregoing document to be served upon the following:

Eric M. Hocky, Esq.
Clark Hill PLC
One Commerce Square
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Suite 1000
Philadelphia, PA 19103

/s/ Robert D. Rosenberg