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EXPEDITED CONSIDERATION REQUESTED

December 12, 2011

BY E-FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
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ENTERED
Office of Proceedings

DEC 12 2011

Part of
Public Record

Re: **STB Docket No. 42130, *Sunbelt Chlor Alkali Partnership v. Norfolk Southern Railway Company and Union Pacific Railroad Company***

Dear Ms. Brown:

Attached for e-filing is a Joint Motion For An Extension of Time in the above-referenced docket.

Thank you for your assistance.

Sincerely,



Michael L. Rosenthal
Counsel for Union Pacific Railroad
Company

cc: G. Paul Moates
Jeffrey O. Moreno

EXPEDITED CONSIDERATION REQUESTED

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

SUNBELT CHLOR ALKALI PARTNERSHIP)

Complainant,)

v.)

NORFOLK SOUTHERN RAILWAY COMPANY)

and)

UNION PACIFIC RAILROAD COMPANY)

Defendants.)

Docket No. NOR 42130

JOINT MOTION FOR AN EXTENSION OF TIME

Complainant Sunbelt Chlor Alkali Partnership ("SunBelt"), and Defendants Norfolk Southern Railway Company ("NS") and Union Pacific Railroad Company ("UP") (collectively, the "Parties") respectfully request that the Surface Transportation Board ("Board") enter an order that would continue the stay of proceedings on UP's motion for partial dismissal and extend the due date for replies to SunBelt's subsequent motion for clarification until January 6, 2012.

Expedited consideration of this motion is requested in order to prevent unnecessary motion practice.

On September 26, 2011, two days before the Parties' mediation sessions began, UP filed a motion with the Board for partial dismissal, or in the alternative, expedited determination of jurisdiction over the challenged rate. In light of the progress made during mediation between SunBelt and UP and the possibility that further settlement discussions might render the motion

unnecessary, the Parties agreed to a stay of UP's motion, including the tolling of SunBelt's and NS's time to file their replies, until December 13, 2011. On December 6, 2011, SunBelt filed a reply to UP's motion, along with a new motion seeking clarification of SunBelt's entitlement to prescription of a joint rate in the event that it prevailed in its rate-reasonableness challenge. Under the Board's rules, replies to SunBelt's motion would be due on December 27.

In light of the progress that has been made in settlement discussions between UP and SunBelt, which may render UP's and SunBelt's motions unnecessary, and in light of scheduling issues that would create difficulties in replying to SunBelt's motion during the holiday season, the Parties have agreed to a continued stay of UP's motion and a stay of SunBelt's motion, including the tolling of the time to file replies to that motion, until January 6, 2012.¹

For the foregoing reasons, the Parties request that the Board enter an order:

1. Holding UP's motion for partial dismissal in abeyance until January 6, 2012, and
2. Extending the due date for replies to SunBelt's motion until January 6, 2012.

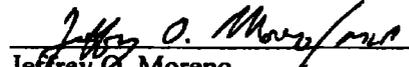
¹ To be clear, this joint motion applies only to SunBelt's motion for clarification. Replies to UP's original motion to dismiss remain due on December 13, 2011. Moreover, this request for a mere 10-day extension to avoid making replies to SunBelt's motion due during the holidays should in no way threaten the timely ultimate resolution of this case.

Respectfully submitted,



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December 12, 2011