

EXPEDITED CONSIDERATION REQUESTED

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

SUNBELT CHLOR ALKALI PARTNERSHIP)	
)	
Complainant)	
v.)	
NORFOLK SOUTHERN RAILWAY COMPANY)	Docket No. NOR 42130
)	232223
and)	ENTERED
)	Office of Proceedings
UNION PACIFIC RAILROAD COMPANY)	April 20, 2012
)	Part of
)	Public Record

MOTION TO MODIFY PROCEDURAL SCHEDULE

Complainant, Sunbelt Chlor Alkali Partnership (“SunBelt”), respectfully requests that the Surface Transportation Board (“STB” or “Board”) modify the procedural schedule in this proceeding, which was adopted by a Board decision served on November 21, 2011, as follows:

August 1, 2012	Opening Evidence
December 4, 2012	Reply Evidence
April 8, 2013	Rebuttal Evidence
May 10, 2013	Final Briefs

This approximate 60-day extension to the current procedural schedule is necessary to enable SunBelt to incorporate 2011 traffic data produced by defendant, Norfolk Southern Railway Company (“NS), into SunBelt’s stand-alone cost evidence. In addition, this extension will reduce the overlap in the submission of evidence in both this case and Docket No. NOR 42125, *E.I. du Pont de Nemours and Company v. Norfolk Southern Ry. Co.*, which currently are separated by just one month.

NS has authorized SunBelt to represent to the Board that NS does not oppose this Motion. SunBelt has reached a settlement with defendant, Union Pacific Railroad Company (“UP”), and expects to file a Motion to Dismiss UP within a few days. Therefore, UP also does

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not oppose this Motion. Because Opening Evidence is currently due in just six weeks, on June 1, 2012, SunBelt requests expedited consideration of this Motion.

Respectfully submitted,



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Counsel for Sunbelt Chlor Alkali Partnership

April 20, 2012

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CERTIFICATE OF SERVICE

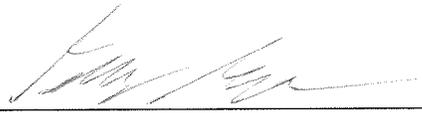
I hereby certify that I have caused the foregoing Motion to Modify Procedural Schedule to be served by e-mail and first class mail this 20th day of April 2012, on:

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