

EXPEDITED CONSIDERATION REQUESTED**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**ENTERED
Office of Proceedings
September 30, 2016
Part of
Public Record****SAN PEDRO PENINSULA HOMEOWNER'S UNITED INC.
AND JOHN TOMMY ROSAS, TRIBAL ADMINISTRATOR,
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION-
PETITION FOR DECLARATORY ORDER**

STB Docket FD 36065

**MOTION FOR EXTENSION OF TIME
TO REPLY TO PETITION**

Pacific Harbor Line, Inc. ("PHL") hereby requests, pursuant to 49 C.F.R. 1104.7(b), an extension of the time period for filing replies to the Petition for Declaratory Order ("Petition"), which Petition was filed in the above-referenced proceeding on September 12, 2016.

The petitioners in this proceeding did not serve PHL with a copy of its Petition until September 20, 2016. The 20-day time period for filing replies under section 1104.13(a) from the date PHL was served with the Petition is October 10, 2016.¹ However, PHL is requesting an extension to file a reply until October 31, 2016. This extension would be consistent with the request filed by the City of Los Angeles ("City") in this proceeding on September 26, 2016.

PHL is the rail carrier that provides rail service to Plains All-America Pipeline. PHL provides this service via the track that appears to be the subject of the Petition. Therefore, the Petition may directly affect the interests of PHL.

Because resolution of the issues raised by Petitioners in their Petition will involve fact-intensive inquiries and historical information, obtaining and synthesizing the relevant materials and information will take time. The extension will afford PHL the time it

¹ PHL did not receive the Petition until September 23, 2016.

needs to assess the assertions raised by the petitioners in this proceeding and to file any appropriate reply.

Accordingly, PHL respectfully requests the Board grant its motion to extend the time period for filing replies in this proceeding until October 31, 2016.

Respectfully submitted,

Rose - Michele Nardi / EDY

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PACIFIC HARBOR LINE, INC.

Date: September 30, 2016

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2016, the foregoing Motion was served by first-class mail, postage prepaid on the following parties:

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