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UPS Next Day Air

March 8, 2005

213504



Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001
(202) 565-1674

ENTERED
Office of Proceedings

MAR - 9 2005

Part of
Public Record

Re: STB Finance Docket No. 34549

Dear Secretary Williams:

Please find enclosed an original and ten copies each of United Transportation Union's Motion to Compel and Motion for Extension of Time for filing in the above-captioned matter. In accordance with prior Board requirements, we have also enclosed a disk in WordPerfect format.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "D. R. Elliott, III".

Daniel R. Elliott, III
Associate General Counsel

Enclosures

cc: C. J. Miller, III, General Counsel

2/3504



**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 34549

**ILLINOIS RAILNET, INC. – ACQUISITION AND
OPERATION EXEMPTION – THE BURLINGTON
NORTHERN AND SANTA FE RAILWAY COMPANY**

**UNITED TRANSPORTATION UNION'S
MOTION FOR EXTENSION OF TIME**

**ENTERED
Office of Proceedings**

MAR - 9 2005

**Part of
Public Record**

Daniel R. Elliott, III
Associate General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107
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United Transportation Union ("UTU") respectfully petitions the Board pursuant to 49 C.F.R. § 1117.1 for an extension of time to file its supplemental petition to revoke in this proceeding.

On September 27, 2004, Illinois Railnet Inc., ("Illinois") filed a verified notice of exemption under 49 C.F.R. § 1150.41. On January 26, 2005, the UTU filed a petition to revoke the exemption, which sought discovery from Illinois under 49 C.F.R. §§ 1121 and 1114. Illinois has refused to fully comply with this request, and UTU is simultaneously filing a Motion to Compel with the Board. UTU feels it cannot fully present its case without the requested document. As a result, UTU asks the Board to institute a procedural schedule once it has ruled on the motion to compel, extending UTU's time to file a supplement to its petition to revoke and Illinois' time to reply.

Respectfully submitted,

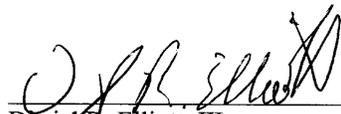


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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing United Transportation Union's Motion for Extension of Time has been served this 8th day of March, 2005 via first-class, postage pre-paid mail upon the following:

John D. Heffner
1920 N. Street, N.W., Ste. 800
Washington, DC 20036



Daniel R. Elliott, III