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BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 32760, SUB FILE 45

IN THE MATTER OF ARBITRATION BETWEEN UNION PACIFIC RAILROAD
COMPANY AND BROTHERHOOD OF LOCOMOTIVE ENGINEERS & TRAINMEN

(Arbitration Review)

CARRIER'S MOTION FOR EXTENSION OF TIME
TO FILE APPEAL FROM ARBITRATION AWARD

COMES NOW Union Pacific Railroad Company (hereinafter "Carrier"), by and through counsel, and moves this Board to permit Carrier an additional 7 days, or until February 22, 2008, to file its appeal from the award of Arbitrator Robert Perkovich, in the above-referenced docket. In support of this Motion, the Carrier states as follows:

1. This matter arises out of a dispute between the Carrier and the Brotherhood of Locomotive Engineers & Trainmen ("BLET") regarding the Carrier's right to establish interdivisional service between Houston, Texas, and several other locations in Texas. The dispute involves important and complex issues regarding the interplay between the 1986 BLET National Agreement and the Houston Hub Merger Implementing Agreement ("Hub Merger Agreement") that was negotiated to implement the economies and efficiencies made possible, as well as the labor protections required, by the Board's approval of the merger between the Carrier and Southern Pacific in Union Pacific Corp. -- Control and Merger -- Southern Pacific Transp. Co., STB Finance Docket No. 32760 (served August 12, 1996).

2. On January 15, 2008, the Board granted a Carrier request to allow it until February 15, 2008, to file its appeal.

3. Carrier's counsel proceeded to work on the appeal brief and the needed exhibits thereto. Rodney A. Harrison and Clifford A. Godiner are the two primary attorneys working on the brief and exhibits.

4. Although the brief and exhibits are mostly complete, Mr. Harrison has become quite ill and unable to complete the needed work to put the brief in final form. Mr. Harrison has been diagnosed with pneumonia and has been unable to come to the office or perform any substantial work this entire week. He will be out of the office the rest of this week (through February 15, 2008), and currently expects to return to the office on Monday, February 18, 2008. Mr. Godiner's schedule will not permit him to complete Mr. Harrison's portion of the brief by this Friday.

5. Given these circumstances, UP respectfully requests one additional week, to and including February 22, 2008, to file its appeal brief and exhibits in the above-referenced matter.

WHEREFORE, Carrier Union Pacific Railroad Company respectfully requests the Surface Transportation Board to enter an Order granting an additional 7 days, to and including February 22, 2008, to file its appeal and for such other relief as is warranted.

Respectfully submitted,

THOMPSON COBURN LLP

By  _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon Gilbert Gore, 1448 MacArthur Avenue, Harvey, Louisiana 70058, by United States Mail, first class postage prepaid, this 13th day of February 2008.

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