

BEFORE THE SURFACE TRANSPORTATION BOARD

Finance Docket No. 36566

**MACQUARIE INFRASTRUCTURE PARTNERS V GP, LLC —ACQUISITION OF
CONTROL EXEMPTION— GRENADA RAILROAD, LLC AND FLORIDA, GULF &
ATLANTIC RAILROAD, LLC**

MOTION FOR LEAVE TO FILE REPLY

International Rail Partners, LLC (“IRP”) respectfully moves the Surface Transportation Board (“Board”) for leave to file a reply to the Reply of Macquarie Infrastructure Partners V GP, LLC (“MIP GP”), for the benefit of Macquarie Infrastructure Partners V fund vehicle (“MIP V”) and MIP V Rail, LLC (“MIP Rail”), to the Verified Petition of International Rail Partners, LLC to Reject Notice of Exemption Or, In The Alternative, For Stay Of Effectiveness (the “Petition”) filed in the above-captioned proceeding. (“MIP GP Reply”). *See* 49 C.F.R. § 1104.13(c). Leave for IRP to file a reply should be granted as the Board's deliberations would be facilitated and administrative economy promoted by the Board having IRP’s position on three issues directly related to the MIP GP Reply: (1) the MIP GP Reply completely mischaracterizes IRP’s purpose for filing its Petition; (2) the MIP GP Reply does not address the complexity of the IRP’s minority ownership of RailUSA, LLC; and (3) the MIP GP Reply raises a novel argument about the interchange commitment notice requirements for acquisitions. IRP’s reply is filed contemporaneously with this motion. This motion is timely brought, as filed within 20 days of the pleading to which it relates. 49 C.F.R. § 1104.13(a). WHEREFORE, IRP respectfully moves for leave to file a reply to MIP GP’s Reply to IRP’s Petition.

Respectfully submitted,

/s/ Daniel R. Elliott

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Attorney for International Rail Partners, LLC

Dated: December 22, 2021

Certificate of Service

I certify that I have, this 22nd day of December 2021, served by email copies of the foregoing document on all parties of record in this proceeding, including:

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/s/ Daniel R Elliott
Daniel R. Elliott
Attorney for International Rail Partners, LLC