

EXPEDITED CONSIDERATION REQUESTED

309121

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
January 17, 2025
Part of
Public Record

Docket No. NOR 42144

**NORTH AMERICA FREIGHT CAR ASSOCIATION; AMERICAN FUEL &
PETROCHEMICAL MANUFACTURERS; THE CHLORINE INSTITUTE; THE
FERTILIZER INSTITUTE; AMERICAN CHEMISTRY COUNCIL; ETHANOL
PRODUCTS,
LLC D/B/A POET ETHANOL PRODUCTS; POET NUTRITION, LLC.; AND CARGILL
INCORPORATED v. UNION PACIFIC RAILROAD COMPANY**

Docket No. NOR 42150

**VALERO MARKETING AND SUPPLY COMPANY
AND VALERO RAIL PARTNERS, LLC v. UNION PACIFIC RAILROAD COMPANY**

Docket No. NOR 42152

**TESORO REFINING & MARKETING COMPANY LLC;
TESORO GREAT PLAINS GATHERING & MARKETING, LLC;
AND DAKOTA PRAIRIE REFINING, LLC v. UNION PACIFIC RAILROAD
COMPANY**

Docket No. NOR 42153

ARKEMA INC. v. UNION PACIFIC RAILROAD COMPANY

COMPLAINANTS' UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME

EXPEDITED CONSIDERATION REQUESTED

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January 17, 2025

On January 15, 2025, the Surface Transportation Board (“Board”) issued a lengthy Decision in these consolidated proceedings, the first of which was commenced in 2015. The Complainants in these proceedings (collectively, “Complainants”) hereby submit this Unopposed Joint Motion for Extension of Time, which seeks a 30-day extension from the date for filing petitions for reconsideration under 49 C.F.R. §1115.3. The Board’s rules provide that the Board may grant extensions of time “in its discretion, upon request and for good cause.” 49 C.F.R. § 1104.7(b). Good cause exists for this extension, because it is necessary for Complainants and their counsel to review the lengthy decision and consider whether reconsideration of one or more aspects of the decision is appropriate.

Pursuant to Section §1115.3, petitions for reconsideration would be due on February 4, 2025. Complainants seek a 30-day extension of that deadline, to March 6, 2025. Counsel for Complainants have conferred with counsel for the Union Pacific Railroad Company (“UP”), and counsel for Complainants are authorized to represent that UP does not have a position on this extension request.

Complainants also request expedited consideration of this motion because the deadline for submitting petitions for reconsideration is in just 18 days.

Accordingly, Complainants respectfully request the Board to extend the deadline for filing petitions for reconsideration to March 6, 2025.

Respectfully submitted,

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January 17, 2025

CERTIFICATE OF SERVICE

I do hereby certify that on this 17th day of January 2025, I have served a copy of
Unopposed Joint Motion for Extension of Time by electronic delivery upon:

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/s/ Jason Tutrone
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