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Office of Chief Counsel
July 22, 2026
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Public Record

By Electronic Mail

July 22, 2026

Hon. Jenifer J. Soulikias
Administrative Law Judge
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Docket No. FD 36873, *Union Pacific Corp., et al. - Control - Norfolk Southern Corp., et al.*

Dear Judge Soulikias:

Applicants write today following Decision No. 26, in which Your Honor requested that the parties propose updated discovery deadlines. Applicants shared a proposed discovery schedule and then conferred with non-Applicant participants on July 20, 2026. As of this time, we have not received any counter-proposal from any of the non-Applicant participants. Applicants remain available to confer further with participants, and submit this letter to allow Your Honor to consider it in advance of the July 24 conference.

As previously emphasized, Applicants agree that reasonable deadlines are necessary to move this proceeding forward. Such deadlines must account for the large number of participants and discovery requests and must preserve each party's authority to determine how to reasonably comply with its discovery obligations.

Consistent with this position, Applicants propose the following discovery schedule and accompanying discovery parameters:¹

- By August 17, 2026, Applicants shall substantially complete custodial productions for Applicants' Initial Custodians and their production of non-custodial documents responsive to requests served before June 30, 2026.² This provision does not supersede Section C(6) of the Discovery Guidelines.

¹ Unless otherwise specified, all deadlines set forth herein shall apply prospectively.

² Initial Custodians are identified in Exhibit A to this letter.

COVINGTON

July 22, 2026

Page 2

- By August 3, 2026, all discovery requests relating to the Applicants' Amended Application, filed April 30, 2026, are due.
- By September 18, 2026, all parties shall substantially complete production of documents responsive to all discovery requests served by August 3, 2026, including custodial productions for the remaining custodians named in Decision No. 25. This provision does not supersede Section C(6) of the Discovery Guidelines.
- Applicants' production of all custodial files shall be subject to the discovery parameters and limitations identified in Exhibit A, covering specific search terms, date ranges, and custodian lists for both UP and NS custodians.³
- The parties, including Applicants and non-Applicant participants, are entitled to determine a reasonable, efficient, and defensible process for identifying and producing responsive custodial documents, including using search terms and TAR, and shall make reasonable efforts to respond to questions from other parties about their discovery methods.⁴
- With the exception of the Application, which is addressed separately in this scheduling proposal, discovery requests that are addressed toward the assertions in a party's filing (including the comments, responsive applications, supplements, or any other filing) are due 20 days after service of such filing.
- Fact witness depositions may be held at any time subject to the terms of the Discovery Guidelines.
- Expert witness depositions may be held at any time subject to the terms of the Discovery Guidelines.
- Limited secondary discovery must be justified by the party serving any such request, subject to a good cause standard, and conform with the discovery schedule. This provision does not limit any party's ability to serve discovery requests directed toward the assertions in another party's filing, so long as such discovery is served within 20 days after service of such filing.

³ The search terms included in Exhibit A reflect Applicants' adoption of all search terms proposed by BNSF. Applicants advised BNSF of its acceptance of these terms on June 11, 2026, and further agreed to extend the search terms back to 2023 on July 18, 2026. In addition, Exhibit A includes search terms requested by CPKC, updated to reflect reasonable adjustments offered by the Applicants.

⁴ Exhibit B includes Applicants' TAR Protocols, which describe how Applicants and their vendors will process, filter, review, train, validate, and produce ESI in the discovery process.

COVINGTON

July 22, 2026

Page 3

This updated proposal is consistent with Applicants' expressed desire to move forward with discovery efficiently.

Sincerely,

/s/ Matthew J. Warren

Matthew J. Warren
Stephen S. Laudone
William A. Mullins
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Carrie Mahan
*Attorneys for Norfolk Southern
Corporation and Norfolk
Southern Railway Company*

/s/ Laura Flahive Wu

Laura Flahive Wu
Kevin M. Kelly
*Attorneys for Union Pacific
Corporation and Union
Pacific Railroad Company*

cc: ALJ Soulikias
All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of July, 2026, the foregoing document was served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General of the United States, and Administrative Law Judge Jenifer Soulikias.

/s/ Charlotte Krovoza

EXHIBIT A**UP Discovery Parameters**

Search Term No.	Time Period	Custodians	Search Terms
1	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (merg* OR transaction OR combination OR acqui* OR control)
2	1/1/2019 to 2/17/2026	All 36 Custodians	(BNSF OR CSX OR CSXT OR "Norfolk Southern" OR NS OR CPKC OR CP OR "Canadian Pacific" OR KCS OR CN OR "Canadian National") AND ("cooperative agreement" OR "joint venture" OR alliance)
3	1/1/2024 to 12/31/2025	All 36 Custodians	"capital budget" OR "capital spending" OR "capital program" OR "capital forecast" OR "annual operating plan" OR "long range plan"
4	1/1/2019 to 2/17/2026	All 36 Custodians	fail* w/25 interline
5	1/1/2019 to 2/17/2026	All 36 Custodians	((yard* OR shop* OR facilit*) w/25 (closing* OR closure* OR rationalize)) AND (price* OR cost*)
6	1/1/2019 to 2/17/2026	All 36 Custodians	interline w/25 (pric* OR quality OR efficien*)
7	1/1/2019 to 2/17/2026	All 36 Custodians	(facilit* w/25 new) w/20 (offer OR bid)
8	1/1/2019 to 2/17/2026	All 36 Custodians	Buffer w/3 (capacity OR employee OR crew OR equipment OR locomotive)
9	1/1/2019 to 2/17/2026	All 36 Custodians	(invest* OR improv*) w/25 (interline OR interchange)
10	1/1/2023 to 2/17/2026	All 36 Custodians	Committed w/2 Gateway
11	1/1/2023 to 2/17/2026	All 36 Custodians	(BNSF OR CSX) w/5 rate
12	1/1/2020 to 2/17/2026	All 36 Custodians	"single line" AND interline AND compet*
13	1/1/2020 to 2/17/2026	All 36 Custodians	interchange w/5 (alternat* OR compet*)
14	1/1/2019 to 2/17/2026	All 36 Custodians	pricing w/5 (formula OR model OR polic* OR strateg* OR system)
15	1/1/2019 to 2/17/2026	All 36 Custodians	(negotiat* OR strateg*) w/10 (bundl* OR tying OR tie OR link* OR leverag* OR multi* OR refun* OR discount* OR waiv*)
16	1/1/2020 to 2/17/2026	All 36 Custodians	amtrak AND (sedalia OR "jefferson city" OR "river subdivision" OR chicago) AND (complain* OR disput*)
17	1/1/2023 to 2/17/2026	All 36 Custodians	"Service Assurance"

18	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (Integ* OR operat* OR diver* OR safety OR "rail service" OR labor OR employment OR ((passenger OR commuter) w/5 service) OR (yard w/2 control) OR (train w/2 build*) OR (transport* w/2 manag*))
19	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (debt OR revenue OR earning* OR EBITDA OR leverage OR (operating w/2 ratio) OR cost* OR synerg* OR competit* OR rate* OR (market w/2 share*) OR concession* OR consolid* OR shareholder* OR invest* OR efficienc* OR growth)
20	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((Board w/5 Director*) OR (Board w/10 Committee))
21	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (gateway* w/10 (traffic OR I-5))
22	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND share* AND (TRRA OR (Terminal w/2 Railroad) OR PPU OR TTX OR (Peoria w/2 Pekin))
23	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((rail w/2 rail) OR watershed OR (lane* w/2 traffic) OR (cross w/2 town w/2 move) OR (data w/2 integ) OR (technolog* w/2 cutover))
24	1/1/2023 to 2/17/2026	All 36 Custodians	(Opal OR "Norfolk Southern" OR NS OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((single w/2 (carrier OR line)) OR "parallel route*" OR defens* OR Amtrak OR "partnership agreement" OR (transition* w/2 service) OR freight OR port* OR trade OR "vertical effect*" OR (negot* w/20 contract*) OR (traffic w/2 (manifest OR level*)) OR "principal route*" OR (truck w/2 rail) OR IT OR tech* OR (service* w/2 disrupt*))

25	1/1/2019 to 2/17/2026	All 36 Custodians	((plan OR strateg*) W/20 (grow* OR increas* OR retain)) W/5 (Volume OR Rail OR Traffic))
26	1/1/2019 to 2/17/2026	All 36 Custodians	((PSR OR "Precision Scheduled Railroading") W/10 service)
27	1/1/2019 to 2/17/2026	All 36 Custodians	((plan OR strateg*) W/20 (retain OR increas*)) W/5 revenue)
28	1/1/2019 to 2/17/2026	All 36 Custodians	(traffic W/5 forecast)
29	1/1/2019 to 2/17/2026	All 36 Custodians	((BNSF OR Basalt OR CSX OR Cobalt OR "Norfolk Southern" OR NS) W/20 (merg* OR transaction OR combination OR acqui* OR control)) OR "transcontinental rail*")
30	3/12/2023 to 2/17/2026	All 36 Custodians	(falcon W/5 premium)
31	1/1/2022 to 2/17/2026	All 36 Custodians	(bundl* OR tying OR tie* OR link* OR leverag* OR provid* OR offer* OR efficien* OR advantage* OR package* OR portfolio) w/30 (multiple w/5 (facilit* OR plant* OR site OR origin* OR destination* OR lane* OR route* OR shipper* OR customer* OR account))
32	1/1/2022 to 2/17/2026	All 36 Custodians	(bundl* OR tying OR tie* OR link* OR leverag* OR provid* OR offer* OR efficien* OR advantage* OR package* OR portfolio) w/30 (sole-served OR solely-served OR "single served" OR captive)
33	1/1/2022 to 2/17/2026	All 36 Custodians	("business review" OR AOP OR "annual operating plan" OR LRP OR "Long range plan") AND (price OR volume OR revenue)
34	1/1/2022 to 2/17/2026	All 36 Custodians	(PSR OR (Precision w/2 Schedul* w/2 Rail*) OR "Unified Plan 2020" OR "UP 2020" OR UP2020) w/30 (service OR frequency OR schedul* OR delay* OR interrupt* OR reduc* OR capacity)
35	1/1/2022 to 2/17/2026	All 36 Custodians	(transcon* OR (east* w/10 west*) OR end-to-end OR duopoly OR coast-to-coast OR first-mover OR downstream) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line)
36	1/1/2022 to 2/17/2026	All 36 Custodians	((UP OR Ruby OR UNP OR UPRR) w/10 (CSX OR Cobalt OR "Norfolk Southern" OR NS OR Nickel OR norfolksouthern)) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line OR end-to-end OR coast-to-coast OR east-west)

37	1/1/2022 to 2/17/2026	All 36 Custodians	((BNSF OR Basalt OR "Union Pacific") w/10 (CSX OR Cobalt OR "Norfolk Southern" OR NS OR Nickel OR norfolksouthern)) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line OR end-to-end OR coast-to-coast OR east-west)
38	03/15/2025 – 02/17/2026	All 36 Custodians	((("Union Pacific" OR UP OR UNP OR UPRR) AND (Louisville OR "Kansas City" OR KCIT OR "Kansas City Intermodal Terminal" OR KC)) w/25 (intermodal OR gateway OR interchange OR interline OR "joint service" OR "new service" OR "domestic intermodal" OR truck-competitive OR "market access"))

	Custodian ¹	Time Period	Status
1	Eric Gehringer	1/1/2019 to 2/17/2026	Initial Custodian
2	Matthew Graham	1/1/2019 to 2/17/2026	Initial Custodian
3	Grant Janke	1/1/2019 to 2/17/2026	Initial Custodian
4	Katherine Novak	1/1/2019 to 2/17/2026	Initial Custodian
5	Maqui Parkerson	1/1/2019 to 2/17/2026	Initial Custodian
6	Joshua Perkes	1/1/2019 to 2/17/2026	Initial Custodian
7	Carrie Powers	1/1/2019 to 2/17/2026	Initial Custodian
8	Kenny Rocker	1/1/2019 to 2/17/2026	Initial Custodian
9	John Turner	1/1/2019 to 2/17/2026	Initial Custodian
10	Jim Vena	1/1/2019 to 2/17/2026	Initial Custodian
11	Todd Rynaski	1/1/2019 to 2/17/2026	Initial Custodian
12	Jennifer Hamann	1/1/2019 to 2/17/2026	Initial Custodian
13	Mike Miller	1/1/2019 to 2/17/2026	Initial Custodian
14	Rahul Jalali	1/1/2019 to 2/17/2026	Initial Custodian
15	Corrie Schumaker	1/1/2019 to 2/17/2026	Initial Custodian
16	Beth Whited	1/1/2019 to 2/17/2026	Initial Custodian
17	Rebecca Gregory ²	1/1/2022 to 2/17/2026	Additional Custodian
18	Brad Moore	1/1/2022 to 2/17/2026	Additional Custodian
19	Jennifer Bailey	1/1/2022 to 2/17/2026	Additional Custodian
20	Mike Santa Maria	1/1/2022 to 2/17/2026	Additional Custodian
21	Carl Garrison	1/1/2022 to 2/17/2026	Additional Custodian
22	Jamie Peters	1/1/2022 to 2/17/2026	Additional Custodian
23	David Hughes	1/1/2022 to 2/17/2026	Additional Custodian
24	Steven Bybee	1/1/2022 to 2/17/2026	Additional Custodian
25	Elise Gosch	1/1/2022 to 2/17/2026	Additional Custodian
26	Hunsdon Cary, IV	1/1/2022 to 2/17/2026	Additional Custodian
27	Jacque Bendon	1/1/2022 to 2/17/2026	Additional Custodian
28	Jason Hess	1/1/2022 to 2/17/2026	Additional Custodian
29	Kari Kirchhoefer	1/1/2022 to 2/17/2026	Additional Custodian
30	Ryan Steinbach	1/1/2022 to 2/17/2026	Additional Custodian
31	Laura Heisterkamp	1/1/2022 to 2/17/2026	Additional Custodian
32	Jason Steele	1/1/2022 to 2/17/2026	Additional Custodian
33	Andrew Brady	1/1/2022 to 2/17/2026	Additional Custodian
34	Jeff Pincock	1/1/2022 to 2/17/2026	Additional Custodian
35	Dan McLaughlin	1/1/2022 to 2/17/2026	Additional Custodian
36	Lance Fritz	1/1/2022 to 2/17/2026	Additional Custodian

¹ For the avoidance of doubt, Union Pacific intends to collect and search documents for the “initial” 16 custodians from 2019-2026 for Search Terms 1-30 and 2022-2026 for Search Terms 31-38 and for the “additional” 20 custodians from 2022-2026 for Search Terms 1-38.

² In agreeing to the additional custodians, Union Pacific noted that Ms. Gregory served in a solely legal role from January 1, 2022 through September 11, 2023, and thus it would not collect documents from this time period. *See* E-mail from Kevin Kelly, to non-Applicant Class I railroads (June 16, 2026, at 9:46 PM ET).

NS Discovery Parameters

Search Term No.	Time Period	Custodians	Search Terms
1	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (merg* OR transaction OR combination OR acqui* OR control)
2	1/1/2023 to 2/17/2026	All 30 Custodians	(Committed w/2 Gateway) OR ((BNSF OR CSX) w/5 rate)
3	1/1/2023 to 2/17/2026	All 30 Custodians	"Service Assurance"
4	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (Integ* OR operat* OR diver* OR safety OR "rail service" OR labor OR employment OR ((passenger OR commuter) w/5 service) OR (yard w/2 control) OR (train w/2 build*) OR (transport* w/2 manag*))
5	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (debt OR revenue OR earning* OR EBITDA OR leverage OR (operating w/2 ratio) OR cost* OR synerg* OR competit* OR rate* OR (market w/2 share*) OR concession* OR consolid* OR shareholder* OR invest* OR efficienc* OR growth)
6	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((Board w/5 Director*) OR (Board w/10 Committee))
7	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (gateway* w/10 (traffic OR I-5))
8	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND (share* and (TRRA OR (Terminal w/2 Railroad) OR PPU OR TTX OR (Peoria w/2 Pekin))
9	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((rail w/2 rail) OR watershed or (lane* w/2 traffic) OR (cross w/2 town w/2 move) OR (data /2 integ) OR (technolog* w/2 cutover))

10	1/1/2023 to 2/17/2026	All 30 Custodians	(Opal OR "Union Pacific" OR "UP" OR Nickel OR Ruby OR Pegasus OR Cobalt OR Basalt) AND ((single w/2 (carrier OR line)) OR "parallel route*" OR defens* OR Amtrak OR "partnership agreement" OR (transition* w/2 service) OR freight OR port* OR trade OR "vertical effect*" OR (negot* /s contract*) OR (traffic w/2 (manifest or level*)) OR "principal route*" OR (truck w/2 rail) OR IT or tech* OR (service* w/2 disrupt*) OR carload OR "supply chain" OR (market* w/2 agree*))
11	1/1/2019 to 2/17/2026	All 30 Custodians	(BNSF or CSX* or "Union Pacific" or "UP" or CPKC or CP or "Canadian Pacific" or KCS or CN or "Canadian National") AND ("cooperative agreement" or "joint venture" or alliance)
12	1/1/2024 to 12/31/2025	All 30 Custodians	"capital budget" or "capital spending" or "capital program" or "capital forecast" or "annual operating plan" or "long range plan"
13	1/1/2019 to 2/17/2026	All 30 Custodians	(eastern w/s (Pennsylvania OR PA)) AND (capacity OR carload* OR tonnage OR operat*)
14	1/1/2019 to 2/17/2026	All 30 Custodians	(fail* w/25 interline)
15	1/1/2019 to 2/17/2026	All 30 Custodians	((yard* or shop* or facilit*) w/25 (closing* or closure* or rationalize)) AND (price* or cost*)
16	1/1/2019 to 2/17/2026	All 30 Custodians	interline w/25 (pric* OR quality OR efficien*)
17	1/1/2019 to 2/17/2026	All 30 Custodians	(facilit* w/25 new) w/20 (offer OR bid)
18	1/1/2019 to 2/17/2026	All 30 Custodians	(buffer w/3 (capacity OR employee OR crew OR equipment OR locomotive))
19	1/1/2019 to 7/29/2025	All 30 Custodians	((invest* OR improv*) w/25 (interline or interchange))
20	1/1/2019 to 2/17/2026	All 30 Custodians	(Rockport OR Middletown OR Enon OR Waynesburg OR Brownsville OR New Orleans OR Columbus) AND (operation* OR dispatch* OR assignment OR (availab* w/3 (equipment OR crews)) OR infrastructure OR improv* OR invest* OR movement* OR metric* OR capacity)
21	1/1/2019 to 2/17/2026	All 30 Custodians	(negotiat* or strateg*) w/10 (bundl* OR tying OR tie OR link* OR leverag* OR "multiple facilit*" OR multi* OR refun* or discount* or waiv*)
22	1/1/2020 to 2/17/2026	All 30 Custodians	("single line" AND interline AND compet*)

23	1/1/2020 to 2/17/2026	All 30 Custodians	interchange w/5 (alternat* OR compet*)
24	1/1/2019 to 2/17/2026	All 30 Custodians	(BNSF or CSX* or "Union Pacific" or "UP" or CPKC or CP or "Canadian Pacific" or KCS or CN or "Canadian National") AND ("cooperative agreement" or "joint venture" or alliance)
25	1/1/2019 to 2/17/2026	All 30 Custodians	(pricing w/5 (formula OR model OR polic* OR strateg* OR system))
26	1/1/2020 to 2/17/2026	All 30 Custodians	((amtrak) AND (sedalia OR "jefferson city" OR "river subdivision" OR chicago)) AND complain* OR disput*)
27	1/1/2019 to 2/17/2026	All 30 Custodians	((UP OR Ruby OR UNP OR UPRR) w/10 (CSX OR Cobalt OR "Norfolk Southern" OR NS OR Nickel OR norfolksouthern)) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line OR end-to-end OR coast-to-coast OR east-west)
27	1/1/2019 to 2/17/2026	All 30 Custodians	((BNSF OR Basalt OR "Union Pacific") w/10 (CSX OR Cobalt OR "Norfolk Southern" OR NS OR Nickel OR norfolksouthern)) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line OR end-to-end OR coast-to-coast OR east-west)
27	1/1/2019 to 2/17/2026	All 30 Custodians	(transcon* OR (east* w/10 west*) OR end-to-end OR duopoly OR coast-to-coast OR first-mover OR downstream) w/30 (merg* OR transaction OR comb* OR acqui* OR control OR consolid* OR single-line)
28	1/1/2024 to 5/31/2024	All 30 Custodians	("lane rationalization" OR (lane w/5 ration*)) OR (("Intermodal" OR "OD pair*") w/10 (review OR optimiz*)) OR ("OD pair*" OR lane* OR corridor* OR route* OR market*) w/10 (eliminat* OR remov* OR discontinu* OR exit* OR consolidat* OR rationaliz* OR optimiz* OR suspend*)) OR ((low-volume OR "low volume" OR density OR "limited growth" OR "growth prospects" OR profit* OR complex*) w/10 ("OD pair*" OR lane* OR corridor* OR route*))

29	3/15/2025 to 2/17/2026	All 30 Custodians	((“Union Pacific” OR “UP” OR “UNP” OR UPRR) AND (Louisville OR "Kansas City" OR KCIT OR "Kansas City Intermodal Terminal" OR “KC”)) w/25 (intermodal OR gateway OR interchange OR interline OR “joint service” OR “new service” OR “domestic intermodal” OR “truck- competitive” OR “market access”)
30	1/1/2019 to 2/17/2026	All 30 Custodians	(“same store” OR “SSP” OR playbook OR “follow the market” OR “market approach” OR “market update”) AND (price OR volume OR revenue)
31	1/1/2019 to 2/17/2026	All 30 Custodians	(PSR OR (Precision w/2 (Schedul* OR Rail*)) OR TOP OR “TOP21” OR “TOP 21” OR “TOP 2021” OR "TOP2021" OR “Thoroughbred Operat*” OR SPG) w/10 (service OR frequency OR schedul* OR delay* OR interrupt* OR reduc* OR capacity OR TPM)
32	1/1/2019 to 2/17/2026	All 30 Custodians	(bundl* OR tying OR tie* OR link* OR leverag* OR provid* OR offer* OR efficien* OR advantage* OR package* OR portfolio) w/30 (sole-served OR solely-served OR "single served" OR captive)
33	1/1/2019 to 2/17/2026	All 30 Custodians	(bundl* OR tying OR tie* OR link* OR leverag* OR provid* OR offer* OR efficien* OR advantage* OR package* OR portfolio) w/30 (multiple w/5 (facilit* OR plant* OR site OR origin* OR destination* OR lane* OR route* OR shipper* OR customer* OR account))

	Custodian	Time Period	Status
1	Mark George	1/1/2019 to 2/17/2026	Initial Custodian
2	John Orr	1/1/2019 to 2/17/2026	Initial Custodian
3	Claude Elkins	1/1/2019 to 2/17/2026	Initial Custodian
4	Mike Barr	1/1/2019 to 2/17/2026	Initial Custodian
5	Anil Bhatt	1/1/2019 to 2/17/2026	Initial Custodian
6	Ed Boyle	1/1/2019 to 2/17/2026	Initial Custodian
7	Felisima de Oliveriera	1/1/2019 to 2/17/2026	Initial Custodian
8	Jacob Elium	1/1/2019 to 2/17/2026	Initial Custodian
9	John Felps	1/1/2019 to 2/17/2026	Initial Custodian
10	Stefan Loeb	1/1/2019 to 2/17/2026	Initial Custodian
11	Mike McClellan	1/1/2019 to 2/17/2026	Initial Custodian
12	Kathleen Smith	1/1/2019 to 2/17/2026	Initial Custodian
13	Dwayne Swindall	1/1/2019 to 2/17/2026	Initial Custodian
14	Yannik Thomas	1/1/2019 to 2/17/2026	Initial Custodian
15	Shawn Tureman	1/1/2019 to 2/17/2026	Initial Custodian
16	Jason Zampi	1/1/2019 to 2/17/2026	Initial Custodian
17	Randolph "Scott" St. Clair	1/1/2019 to 2/17/2026	Additional Custodian
18	Tim Livingston	1/1/2019 to 2/17/2026	Additional Custodian
19	Craig Hudson	1/1/2019 to 2/17/2026	Additional Custodian
20	Rob Jones	1/1/2019 to 2/17/2026	Additional Custodian
21	Mike Grim	1/1/2019 to 2/17/2026	Additional Custodian
22	Marybeth Flournoy	1/1/2019 to 2/17/2026	Additional Custodian
23	Christine Traubel	1/1/2019 to 2/17/2026	Additional Custodian
24	Frank Voyack	1/1/2019 to 2/17/2026	Additional Custodian
25	Elizabeth Talton-Buck	1/1/2019 to 2/17/2026	Additional Custodian
26	Alan Shaw	1/1/2019 to 2/17/2026	Additional Custodian
27	James Squires	1/1/2019 to 2/17/2026	Additional Custodian
28	Paul Duncan	1/1/2019 to 2/17/2026	Additional Custodian
29	Cindy Sanborn	1/1/2019 to 2/17/2026	Additional Custodian
30	Michael Wheeler	1/1/2019 to 2/17/2026	Additional Custodian

EXHIBIT B

Filed under seal pursuant to the Protective Order