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BEFORE THE
SURFACE TRANSPORTATION BOARD

35853
Docket No. FD ~~38853-0~~

ENTERED
Office of Proceedings
September 5, 2014
Part of
Public Record

SEA-3, INC. -EMERGENCY PETITION
FOR DECLARATORY ORDER

MOTION FOR EXTENSION OF TIME

 GRANTED Office of Proceedings	DECISION ID NO.: <u>44012</u>
	DECIDED DATE: <u>9/8/14</u>
	SERVICE DATE: <u>9/18/14</u>
	APPROVED: <u>Rachel D. Campbell</u> Director
☐	_____

Robert B. Culliford
Boston and Maine Corporation/
Springfield Terminal Railway Company
1700 Iron Horse Park
North Billerica, MA 01862

September 5, 2014

*Counsel for Boston and Maine
Corporation/Springfield Terminal Railway
Company*

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. FD 35853-0

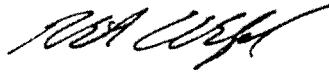
**SEA-3, INC. –EMERGENCY PETITION
FOR DECLARATORY ORDER**

MOTION FOR EXTENSION OF TIME

On August 22, 2014, the Boston and Maine Corporation and Springfield Terminal Railway Company (collectively “Pan Am”) submitted a Petition for Leave to Intervene in Support of the Emergency Petition for Declaratory Order filed by Sea-3, Inc. (“Sea-3”) on August 4, 2014 and for Leave to File More Substantive Arguments at a Later Date (the “Petition”), which was granted by the Board on August 29, 2014. Since Pan Am’s filing of the Petition, Sea-3 and the City of Portsmouth (“Portsmouth”) have engaged in discussions regarding a possible resolution of this matter, and on September 4, 2014 Portsmouth presented Sea-3 with a written proposal. Sea-3 is currently reviewing that proposal and is not yet in a position to comment on its terms, though further discussions are likely. Therefore, Pan Am respectfully requests that it be granted an extension of time in which to file more substantive

arguments, if necessary, until September 30, 2014. Both Sea-3 and Portsmouth assent to this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "RBC", is positioned above the printed name.

Robert B. Culliford
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September 5, 2014

*Counsel for Boston and Maine Corp./ Springfield
Terminal Railway Co.*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2014, I served a copy of the foregoing Motion for Extension of Time upon all parties of record in this proceeding by electronic mail and first class mail, postage prepaid.


Robert B. Cullford