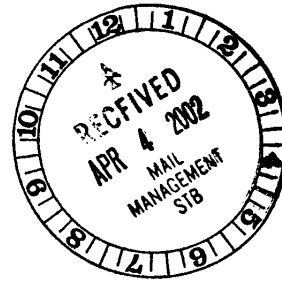


**Berliner
Candon
Jimison**

Washington, Los Angeles,
Berkeley, and Sacramento
A Professional Corporation

205-115-

April 4, 2002



Mr. Vernon A. Williams
Secretary
Surface Transportation Board
1925 "K" Street, N.W.
7th Floor Reception Desk
Washington, D.C. 20423

**Re: Government of the Territory of Guam v. Sea-Land Service, Inc.,
American President Lines, LTD, and Matson Navigation Company, Inc.,
STB Docket No. WCC - 101**

Dear Mr. Williams:

Enclosed for filing please find an original and ten (10) copies of the "Motion for 14-Day Extension of Procedural Schedule in Phase II" for the Government of the Territory of Guam.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Berliner'.

Roger A. Berliner, Esq.
Counsel for Complainant
Government of the Territory of Guam

1225 19th Street, NW, Suite 800
Washington, DC 20036-2453 USA
Telephone 202.955.6067 ext 308
Fax 202.822.0109

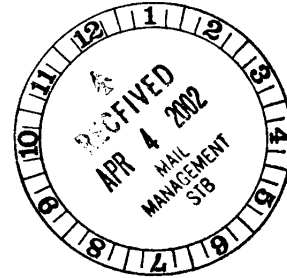
BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Docket No. WCC-101

GOVERNMENT OF THE TERRITORY OF GUAM

v.

SEA-LAND SERVICE, INC., AND
MATSON NAVIGATION COMPANY, INC.



**MOTION FOR 14-DAY EXTENSION
OF PROCEDURAL SCHEDULE
IN PHASE II**

Roger A. Berliner
Mary Eva Candon
BERLINER CANDON JIMISON
1225 19th Street, NW, Suite 800
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(202) 955-6067
Fax: 202-822-0109

Counsel for Complainant
Government of the Territory
of Guam

April 4, 2002

Complainant the Government of Guam hereby moves for an order granting a fourteen day extension of time for the filing of initial and reply submissions in Phase II of this proceeding. Initial submissions by all parties in Phase II are currently due on April 9, 2002 and reply submissions are due on June 3, 2002. Complainant seeks an extension of time for the filing of initial submissions until April 23, 2002, and a parallel extension of the reply submissions until June 17, 2002. This modest extension of the procedural schedule has been necessitated by the illness of counsel. Complainant has conferred with Defendants and Intervenor regarding this motion and the Complainant is authorized to state that the motion is not opposed.

Respectfully submitted,



Roger A. Berliner, Esq.
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Counsel for Complainant
Government of The Territory of Guam

Dated: April 4, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have, this 4th day of April, 2002, caused a copy of the foregoing
“Motion for 14-Day Extension of Procedural Schedule in Phase II” document to be served upon
the chief legal officers as follows:

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