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UPS Next Day Air

February 12, 2004



The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

Re: Finance Docket No. 34411
New Orleans & Gulf Coast Railway
Company, Inc. – Lease Exemption –
Union Pacific Railroad Company

Dear Secretary Williams:

Please find enclosed the original and ten (10) copies of United Transportation Union's Request for Production of Documents in the above-captioned matter. Also enclosed is a 3.5 inch disk with the text of the document request in WordPerfect format.

Thank you for your cooperation.

Sincerely,

Daniel R. Elliott, III
Associate General Counsel

Enclosure

ENTERED
Office of Proceedings
FEB 12 2004
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Public Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 34411

**NEW ORLEANS & GULF COAST RAILWAY
COMPANY, INC. – LEASE EXEMPTION –
UNION PACIFIC RAILROAD COMPANY**

**UNITED TRANSPORTATION UNION 'S REQUEST
FOR PRODUCTION OF DOCUMENTS**



FEB 10 2003

**Part of
Public Record**

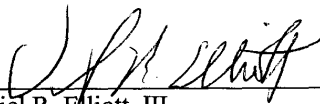
Pursuant to 49 C.F.R. § 1114.30, United Transportation Union (“UTU”) directs the following document requests to New Orleans & Gulf Coast Railway Company, Inc. (“NOGC”).

Responses should be served as soon as possible, and in no event later than 15 days from the date of service hereof. UTU will pay all reasonable costs for duplication and delivery of documents to its attorneys. “Documents” are writings or compilations of information in any form, including electronic messages. NOGC should contact the undersigned promptly to discuss any objections or questions regarding these requests with a view to resolving any disputes or issues of interpretation informally and expeditiously.

DOCUMENT REQUEST

1. Produce the documents referred to in the Verified Notice of Exemption Section (c) Statement of Agreement, including but not limited to the agreement between New Orleans & Gulf Coast Railway Company, Inc. and Union Pacific Railroad Company for the lease of the line at issue in Finance Docket No. 34411, and any and all attachments or exhibits thereto.

Respectfully submitted,

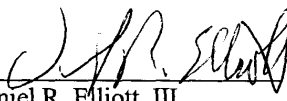
A handwritten signature in dark ink, appearing to read "D. R. Elliott, III", written over a horizontal line.

Daniel R. Elliott, III
Associate General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107
(216) 228-9400

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing United Transportation Union's Request for Production of Documents to New Orleans & Gulf Coast Railway has been served this 21 day of February, 2004 via UPS Next Day Air delivery upon the following:

Karl Morell
Ball Janik
1455 F. Street, N.W., Ste. 225
Washington, DC 20005


Daniel R. Elliott, III