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ENTERED
Index of Proceedings

MAR 29 2004

Part of
Public Record

SURFACE TRANSPORTATION BOARD

Adverse Abandonment Proceeding

AB Docket No. 600



YAKIMA INTERURBAN LINES ASSOCIATION - ADVERSE ABANDONMENT

in YAKIMA COUNTY, WASHINGTON

MOTION AND DECLARATION FOR EXTENSION OF TIME TO REPLY

Comes now Kershaw Sunnyside Ranches, Inc., by and through Kevan T. Montoya, one of its attorneys, and moves the Surface Transportation Board for an extension of time to file Kershaw Sunnyside Ranches' Reply in this case.

This Motion is based on the attached Declaration of Kevan T. Montoya and the records and files herein.

DECLARATION OF KEVAN T. MONTOKA

1. I am one of the attorneys for Kershaw Sunnyside Ranches, Inc. I am a shareholder at the firm of Velikanje, Moore & Shore, Inc. I make this declaration based on knowledge of facts to which I am competent to testify and would testify at trial.
2. Sarah Wixson, an attorney in my office, has been the principal attorney for this case. She has briefed all of the issues and prepared all of the filings. She has also reviewed all of the response filings to prepare a reply.
3. A member of Ms. Wixson's immediate family is terminally ill with cancer. Ms. Wixson anticipates leaving Yakima, Washington on March 26, 2004, to go to Texas to be with her family member because her condition has deteriorated. She found out

MOTION AND DECLARATION FOR
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Velikanje, Moore & Shore, P.S.
attorneys at law
405 East Lincoln Ave.
P.O. Box 22550
Yakima, WA 98907
(509) 248-6030

about the hospitalization on March 25, 2004, but did not learn the severity until March 26, 2004. She is not sure how long she will be gone.

4. The due date for the reply in this case is April 1, 2004. Because of the illness in Ms. Wixson's family, she is not able to prepare the reply by that date.

5. I can prepare the reply; however, I am only generally familiar with the status of the case from receiving periodic summary briefings from Ms. Wixson. I will need to review all of the filings if I am going to prepare the reply. Furthermore, because of my schedule, I will need until April 30, to ensure that I will have adequate time to reply if Ms. Wixson is not able to come back and prepare the reply.

6. We request that the Surface Transportation Board extend the filing date for the reply to April 30, 2004. We have filed this motion as soon as it was clear that we would not be able to make the filing date for the reply.

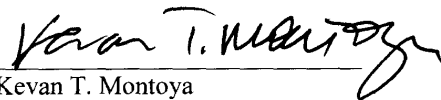
Dated this 26th day of March, 2004.

MOTION AND DECLARATION FOR
EXTENSION OF TIME TO REPLY 2

Velikanje, Moore & Shore, P.S.
attorneys at law
405 East Lincoln Ave.
P.O. Box 22550
Yakima, WA 98907
(509) 248-6030

State of Washington)
:ss
County of Yakima)

Kevan T. Montoya, makes oath and says that he is an attorney with the firm of Velikanje, Moore and Shore, P.S., counsel for Kershaw Sunnyside Ranches, Inc. applicant herein; that he has been authorized by the applicant to verify and file with the Surface Transportation Board the foregoing MOTION AND DECLARATION FOR EXTENSION OF TIME TO REPLY in STB-AB 600; that he has carefully examined all the statements in the application as well as the exhibits attached thereto and made a part thereof; that he has knowledge of the facts and matter relied upon in the application and that all representations set forth therein are true and correct to the best of his knowledge information, and belief.


Kevan T. Montoya

Subscribed and sworn to before me, Jennifer D. Ooley, in and for the State and County above named, this 26th date of March, 2004.


Jennifer D. Ooley



MOTION AND DECLARATION FOR
EXTENSION OF TIME TO REPLY 3

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attorneys at law
405 East Lincoln Ave.
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Yakima, WA 98907
(509) 248-6030