

LAW OFFICES
DESPRES, SCHWARTZ & GEOGHEGAN

77 WEST WASHINGTON STREET - SUITE 711

CHICAGO, ILLINOIS 60602-2803

LEON M. DESPRES
THOMAS H. GEOGHEGAN
DEBORAH L. MAHONEY
CAROL T. NGUYEN

ALBERT SCHWARTZ (1918-1999)

(312) 372-2511
FAX (312) 372-7391
E-MAIL DSG77@AOL.COM

June 1, 2005

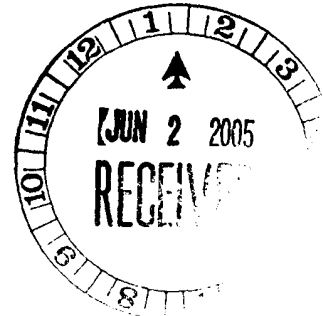
014116

VIA OVERNIGHT MAIL

Mr. Vernon A. Williams, Secretary of Proceedings
Surface Transportation Board
Suite 700
1925 K Street, NW
Washington, DC 20006

ENTERED

Part of
Public Record



RE: STB Finance Docket No. 32760 - 4/4/
In the Matter of the New York Dock Arbitration
Between Union Pacific Railroad Company and
Brotherhood of Locomotive Engineers and Trainmen

Dear Mr. Williams:

Enclosed for filing in the above-entitled proceeding are the original and ten (10)
copies of Petitioner's Motion for Leave to File A Sur-Reply and Petitioner's Sur-Reply

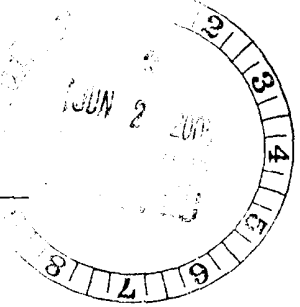
Very truly yours,

Carol Nguyen
Attorneys for Petitioner,
Brotherhood of Locomotive Engineers
and Trainmen.

CC: Clifford Godiner w/enclosures

BEFORE THE
SURFACE TRANSPORTATION BOARD

214116
FINANCE DOCKET NO. 32760, SUB-FILE 44



IN THE MATTER OF ARBITRATION BETWEEN UNION PACIFIC RAILROAD
COMPANY AND THE BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND
TRAINMEN

ENTERED
Office of Proceedings PETITIONER'S MOTION FOR LEAVE TO FILE A REPLY OR SUR-REPLY

JUN 02 2005

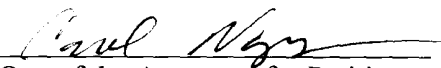
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Petitioner Brotherhood of Locomotive Engineers and Trainmen (BLET) respectfully
requests leave of the Surface Transportation Board to file this reply or sur-reply to the reply
of the Carrier. In support of this motion, BLET states:

1. BLET is mindful that the Surface Transportation Board (STB) does not provide for a rebuttal brief.
2. The Carrier's novel jurisdictional argument has serious consequences. It is important and appropriate to point out these consequences in this very brief sur-reply.

WHEREFORE, Petitioner respectfully requests that the STB grant this motion.

Dated: June 1, 2005


One of the Attorneys for Petitioner

Thomas H. Geoghegan
Carol Nguyen
Despres Schwartz & Geoghegan
77 W. Washington, Suite 711
Chicago, IL 60602