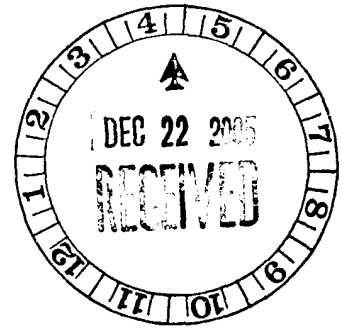


December 22, 2005

Via Hand Delivery

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K St. N.W.
Washington, D.C. 20423



RE: STB Docket No. 34795, *Roquette America, Inc. – Petition for Exemption from 49 U.S.C. § 10901 to Construct a New Line of Rail in Keokuk, Iowa*

Dear Secretary Williams:

Please find enclosed for filing the original and ten (10) copies of Roquette America, Inc.'s Motion for Procedural Schedule in the above referenced proceeding. **Please note that Roquette is requesting Expedited Consideration.**

An extra copy of this filing is enclosed for stamping and returning to our offices.

Should you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Sincerely, /

Jeffrey O. Moreno

EXPEDITED CONSIDERATION REQUESTED

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

STB FINANCE DOCKET NO. 34795

**ROQUETTE AMERICA, INC. - PETITION FOR EXEMPTION FROM 49 U.S.C. §10901
TO CONSTRUCT A NEW LINE OF RAIL IN KEOKUK, IA**

MOTION FOR PROCEDURAL SCHEDULE



215420

Roquette America Railway, Inc. ("Roquette") hereby requests that the Board establish a procedural schedule in this proceeding. Roquette requests expedited consideration of this motion so as not to delay implementation of the procedural schedule requested herein.

On December 19, 2005, Keokuk Junction Railway Company ("KJRY") submitted a "Reply to Petition for Exemption" ("Reply"). Although labelled a "Reply," the contents suggest that it is in fact a motion to dismiss, since KJRY asks the Board to dismiss Roquette's Petition, or in the alternative, to establish a procedural schedule (including discovery) to allow a full exploration of the facts and issues behind Roquette's proposed rail construction project. However, when asked for clarification, KJRY's counsel has informed Roquette's counsel that KJRY considers "what was filed by KJRY on Dec. 19 to be a reply to Roquette's petition, to which no further reply is called for under the Board's regulations." Accepting this statement as true, Roquette does not intend to file a reply within 20 days, as would otherwise be required under the Board's rules.

Roquette, however, does not object to the establishment of a procedural schedule and to the pursuit of reasonable discovery by KJRY. In fact, KJRY served discovery on Roquette on December 16, 2005, to which KJRY has directed Roquette to respond by January 3, 2006.

EXPEDITED CONSIDERATION REQUESTED

Despite the intervening Christmas and New Year's holiday period, Roquette is endeavoring to prepare responses and objections within this time frame. Roquette welcomes the full exploration of the legal facts and issues that KJRY seeks, to the extent they are relevant to the Petition.

Roquette is confident that this process will reveal that KJRY's objections to Roquette's proposal are nothing more than desperately misguided attempts to keep Roquette as a captive shipper.

Roquette, however, believes it would be a waste of time and resources, as KJRY proposes, for Roquette to submit an opening statement, followed by a KJRY reply statement, and a Roquette rebuttal statement, since the opening and reply statements would be substantially repetitive of the pleadings already on record. Roquette's Petition for Exemption can serve as its opening statement and KJRY's "Reply" can serve as its reply statement. To the extent that KJRY wishes to supplement its reply statement with information that Roquette produces in discovery, Roquette would agree to accommodate that in the procedural schedule. Roquette then would submit its rebuttal statement.

Roquette, therefore, proposes the following procedural schedule:

Discovery Phase:

Roquette submits responses to KJRY discovery requests	Jan. 3
KJRY files motion to compel, if necessary	Jan 13(per STB rule)
Roquette replies to motion to compel	Feb. 2(per STB rule)
STB decision on motion to compel (If no motion to compel is filed, January 3rd will be Day 0)	Day 0
Roquette response to KJRY discovery, if required	Day 0+10

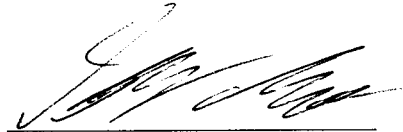
Briefing Phase:

KJRY supplements its "Reply to Petition for Exemption"	Day 0+25
Roquette submits its rebuttal statement (including reply to motion to dismiss)	Day 0+55

EXPEDITED CONSIDERATION REQUESTED

WHEREFORE, for the foregoing reasons, Roquette asks the Board to adopt the procedural schedule presented herein. In order to allow the Board to grant expedited consideration, Roquette proposes that KJRY reply to this motion by Wednesday, December 28, 2005.

Respectfully submitted,



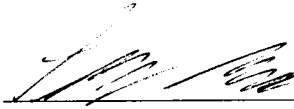
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*Attorneys for Roquette America, Inc. and
Roquette America Railway, Inc.*

December 22, 2005

EXPEDITED CONSIDERATION REQUESTED

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December, 2005, copies of the foregoing
Discovery Responses and Objections were served by hand delivery upon counsel for Keokuk
Junction Railway Co.



Jeffrey O. Moreno