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December 5, 2006

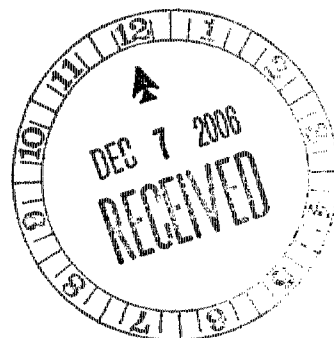
VIA FEDERAL EXPRESS

Attn: Secretary
Surface Transportation Board
1925 "K" Street NW
Suite 700
Washington DC 20423

ENTERED
OFFICE OF THE SECRETARY

DEC 06 2006

Part of
Public Record



218232

RE: Savannah Port Terminal Railroad, Inc. – Petition for Declaratory Order-
Certain Rates & Practices as Applied to Capital Cargo, Inc.
STB Docket No. FD34920

Dear Secretary:

Please find enclosed an original and ten (10) copies of Savannah Port Terminal Railroad's Motion for Extension of Time to File Reply. Should you have any questions, please do not hesitate to contact me. A copy has been provided to opposing counsel.

Sincerely,

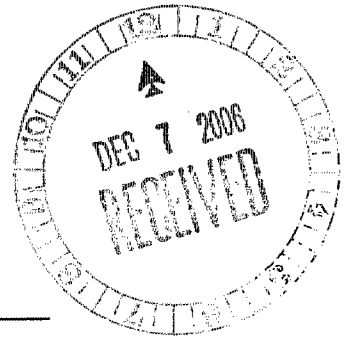

P. Campbell Ford

Enclosure/

Original Motion for Extension of Time to File Reply
10 Copies of Petition

C: Daniel L. Rosenthal, Esquire (1 copy only)

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



DOCKET NO.: FD34920

UNITED STATES
DEPARTMENT OF TRANSPORTATION

DEC 7 2008

RECEIVED

**SAVANNAH PORT TERMINAL RAILROAD, INC. –
PETITION FOR DECLARATORY ORDER**

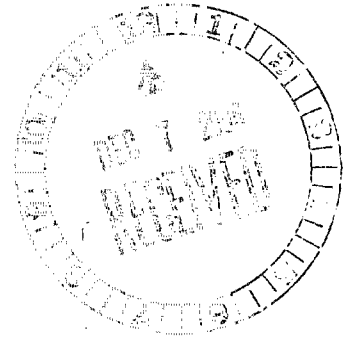
**MOTION OF CLAIMANT, SAVANNAH PORT TERMINAL RAILROAD, INC.,
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

**P. Campbell Ford, Esq.
Ford, Miller & Wainer, P.A.
1200 Riverplace Blvd., Suite 600
Jacksonville, Florida 32207
904-390-1970 (telephone)
904-390-1975 (facsimile)**

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

DOCKET NO.: FD34920

**SAVANNAH PORT TERMINAL RAILROAD, INC. –
PETITION FOR DECLARATORY ORDER**



**MOTION OF CLAIMANT, SAVANNAH PORT TERMINAL RAILROAD, INC.,
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

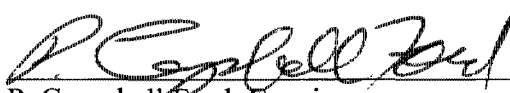
Pursuant to 49 C.F.R. §1104.7, Petitioner, Savannah Port Terminal Railroad, Inc. (“SPTR”), respectfully requests an extension of time to and including January 31, 2007, to file its response to Respondent’s, Capital Cargo, Inc. (“Capital Cargo”), Cross-Complaint, which would be due on or about December 19, 2006. The reason for requesting an extension is that SPTR needs sufficient time to respond to Capital Cargo’s Cross-Complaint as there are substantial and complex issues relating to the contracts governing the parties’ relationship and the applicability and interpretation of tariffs. In addition, SPTR’s undersigned counsel is involved in a class action case that is scheduled to be heard for an evidentiary hearing later in this month of December; and the remaining days in December will be consumed by the holidays, which leaves inadequate time to prepare an Answer to the Cross-Complaint.

The undersigned counsel have conferred with counsel for Capital Cargo, Daniel L. Rosenthal, Esquire, who informed Ella Lim, Esquire, of Ford, Miller & Wainer, P.A., that he had no objections but would need to discuss SPTR’s request for an extension to

reply to Capital Cargo's Cross-Complaint until January 31, 2007, with one individual before agreeing to the extension.

Dated: December 5, 2006

Respectfully submitted,



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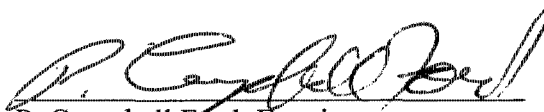
Attorney for Petitioner
Savannah Port Terminal Railroad, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Secretary Surface Transportation Board, 1925 "K" Street NW, Suite 700, Washington, DC 24023 via federal express, and to Daniel L. Rosenthal, Verrill Dana LLP, P.O. Box 586, One Portland Square, Portland, ME 04112-0586 via U.S. Regular Mail on this 5th day of December, 2006.

Dated: December 5, 2006

Respectfully submitted,



P. Campbell Ford, Esquire
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(904) 390-1970

Attorney for Petitioner
Savannah Port Terminal Railroad, Inc.