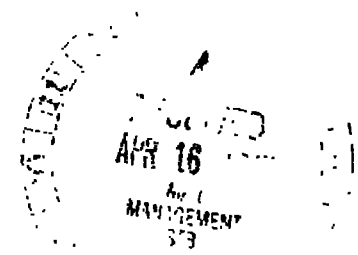




KAPLAN KIRSCH ROCKWELL

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April 16, 2005

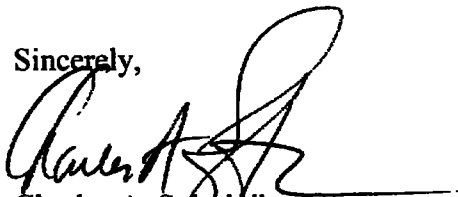
Honorable Vernon A. Williams
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: *Maryland Transit Administration – Petition for Declaratory Order*
Finance Docket No. 34975

Dear Sir:

I am enclosing an original and ten (10) copies of the Motion of Maryland Transit Administration for an Extension of the Time to File Response in the above referenced proceeding. An extra copy is enclosed for date stamp and return to our messenger. Please note that a 3.5 inch diskette is enclosed with this document.

Sincerely,



Charles A. Spitulnik

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Office of Proceedings

Part of
Public Record

Enclosure

132495

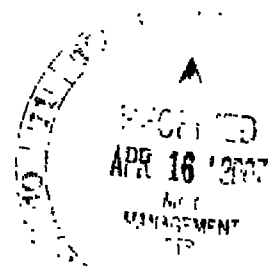
Attorneys at Law
Denver • New York • Washington, DC

Kaplan Kirsch & Rockwell LLP
1001 Connecticut Ave., N.W., Suite 905
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**Before the
SURFACE TRANSPORTATION BOARD
Washington, D.C.**

Finance Docket No. 34975



**MARYLAND TRANSIT ADMINISTRATION –
PETITION FOR DECLARATORY ORDER**

**MOTION OF MARYLAND TRANSIT ADMINISTRATION FOR AN
EXTENSION OF THE TIME TO FILE RESPONSE**

Communications with respect to this
document should be addressed to:

Charles A. Spitulnik
Allison I. Fultz
Kaplan Kirsch & Rockwell LLP
1001 Connecticut Avenue, NW, Suite 905
Washington, D.C. 20036
(202) 955-5600
cspitulnik@kaplankirsch.com
afultz@kaplankirsch.com

Dated: April 16, 2007

**Before the
SURFACE TRANSPORTATION BOARD
Washington, D.C.**

Finance Docket No. 34975

**MARYLAND TRANSIT ADMINISTRATION –
PETITION FOR DECLARATORY ORDER**

**MOTION OF MARYLAND TRANSIT ADMINISTRATION FOR AN
EXTENSION OF THE TIME TO FILE RESPONSE**

Pursuant to 49 C.F.R. §1104.7(b), the Maryland Transit Administration ("MTA") seeks an extension of time to file its response to the STB Decision issued on March 30, 2006, in connection with this proceeding. According to the Board's March 30 Order, MTA's response is due on April 16, 2007. MTA seeks up to an additional four (4) days, through and including Friday April 20, 2007, to file its response.

MTA is diligently collecting the information requested by the Board. However, the intervention of the Passover and Easter holidays between the March 30 Order and today, as well as the volume of information that is necessary and available to respond to the Board's questions, require MTA to request additional time to complete the response.

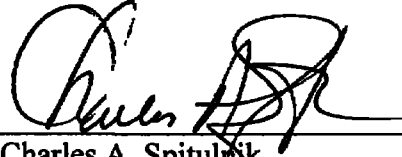
No party will be prejudiced if MTA is granted additional time to file. Instead, the requested extension will allow MTA to produce a complete record upon which the Board will base its decision in this proceeding.

In addition, counsel for MTA has advised both Mr. James Riffin and Mr. Eric Strohmeyer, who are listed as parties of record in this proceeding, of MTA's intent to file this Motion for an extension of time. Both Messrs. Riffin and Strohmeyer have indicated that they do not object to the requested extension.

Wherefore, MTA respectfully requests the Board to extend the time for responding to the March 30, 2007, Order in this proceeding, through and including April 20, 2007.

Dated: April 16, 2007

Respectfully submitted,

Handwritten signatures of Charles A. Spitulnik and Allison I. Fultz, written in black ink over a horizontal line.

Charles A. Spitulnik
Allison I. Fultz
Kaplan Kirsch & Rockwell LLP
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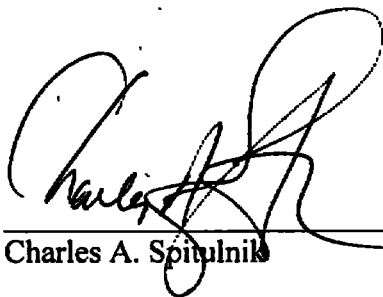
CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing Motion of Maryland Transit Administration for Extension of Time to File a Response to be served by first class mail, properly addressed and with postage prepaid, upon the following parties of record to this proceeding:

Eric S. Strohmeyer
CNJ Rail Corporation
833 Carnoustie Drive
Bridgewater, NJ 08807

James Riffin
1941 Greenspring Drive
Timonium, MD 21093

Dated this 16th day of April, 2007.


Charles A. Spitulnik

132420