

310452

UP-10/NS-9

ENTERED

BEFORE THE  
SURFACE TRANSPORTATION BOARD

Office of Chief Counsel

December 5, 2025

Part of

Public Record

Finance Docket No. 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY

—CONTROL—

NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN  
RAILWAY COMPANY

**AMENDMENT TO NOTICE OF INTENT TO FILE APPLICATION**

RAYMOND A. ATKINS  
CARRIE C. MAHAN  
MATTHEW J. WARREN  
ALLISON C. DAVIS  
MARC A. KORMAN  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000

JASON M. MORRIS  
JOSEPH H. CARPENTER IV  
THOMAS E. ZOELLER  
HANNA M. CHOUEST  
T. MATTHEW LOCKHART  
Norfolk Southern Railway Company  
650 W. Peachtree Street NW  
Atlanta, GA 30308

*Attorneys for Norfolk Southern Corporation  
and Norfolk Southern Railway Company*

December 5, 2025

MICHAEL L. ROSENTHAL  
DEREK LUDWIN  
JAMES J. O'CONNELL  
MATTHEW J. GLOVER  
PEGAH NABILI  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
(202) 662-6000

CHRISTINA B. CONLIN  
JAMES B. BOLES  
TONYA W. CONLEY  
TANYA L. SPRATT  
Union Pacific Railroad Company  
1400 Douglas Street  
Omaha, NE 68179

*Attorneys for Union Pacific Corporation  
and Union Pacific Railroad Company*

Pursuant to 49 C.F.R. § 1180.4(b)(3) and the Board’s Decision No. 3, Union Pacific Corporation (“UPC”) and Union Pacific Railroad Company (“UP”) (collectively, “Union Pacific”) and Norfolk Southern Corporation (“NSC”) and Norfolk Southern Railway Company (“NS”) (collectively “Norfolk Southern”) submit this amendment to their Notice of Intent to File Application (UP-1/NS-1) to notify the Surface Transportation Board of a change in the anticipated filing date for their application seeking authority under 49 U.S.C. §§ 11323-25 for the acquisition of control by UPC, through its wholly owned subsidiary Ruby Merger Sub 1 Corporation, of NSC, and through it of NS, and for the resulting common control by UPC of UP and NS. Union Pacific and Norfolk Southern (collectively, “Applicants”) now anticipate filing their application on or about December 19, 2025.

Respectfully submitted,

/s/ Raymond A. Atkins  
RAYMOND A. ATKINS  
CARRIE C. MAHAN  
MATTHEW J. WARREN  
ALLISON C. DAVIS  
MARC A. KORMAN  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000

JASON M. MORRIS  
JOSEPH H. CARPENTER IV  
THOMAS E. ZOELLER  
HANNA M. CHOUEST  
T. MATTHEW LOCKHART  
Norfolk Southern Railway Company  
650 W. Peachtree Street NW  
Atlanta, GA 30308

*Attorneys for Norfolk Southern Corporation  
and Norfolk Southern Railway Company*

December 5, 2025

/s/ Michael L. Rosenthal  
MICHAEL L. ROSENTHAL  
DEREK LUDWIN  
JAMES J. O'CONNELL  
MATTHEW J. GLOVER  
PEGAH NABILI  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
(202) 662-6000

CHRISTINA B. CONLIN  
JAMES B. BOLES  
TONYA W. CONLEY  
TANYA L. SPRATT  
Union Pacific Railroad Company  
1400 Douglas Street  
Omaha, NE 68179

*Attorneys for Union Pacific Corporation  
and Union Pacific Railroad Company*

### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 5<sup>th</sup> day of December 2025, the foregoing document was served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General of the United States, and Administrative Law Judge Jenifer Soulikias.

/s/ Caroline Harrison