

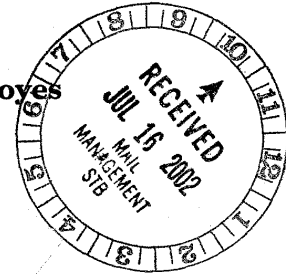
Mac A. Fleming
President



William E. LaRue
Secretary-Treasurer

Brotherhood of Maintenance of Way Employees

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July 15, 2002

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via messenger

Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W., Room 700
Washington, D.C. 20423

Re: Finance Docket No. 34177
Iowa, Chicago & Eastern R.R.—Acquisition & Operation Exemption—Lines of
I&M Rail Link, LLC

Dear Secretary Williams:

Enclosed for filing with the Board are the original and ten copies of three documents from the Cooperating Labor Organizations ("CLO"). CLO-3, a motion to compel discovery responses; CLO-4 a supplement to CLO's motion for stay and opposition to IC&E's motion to lift stay; and CLO-5 a motion to extend the time for CLO to supplement its petition to revoke. Three diskettes containing the documents are enclosed in WordPerfect 6/7/8 format.

Please file stamp the extra copy carried by the messenger so it can be returned to the undersigned. Thank you.

Respectfully,

Asst. General Counsel

enclosures
cc: service list

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BEFORE THE
SURFACE TRANSPORTATION BOARD



FINANCE DOCKET NO. 34177

IOWA, CHICAGO & EASTERN RAILROAD CORPORATION
-- ACQUISITION AND OPERATION EXEMPTION --
LINES OF I&M RAIL LINK, LLC

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MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE SUPPLEMENT TO PETITION TO REVOKE

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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 34177

**IOWA, CHICAGO & EASTERN RAILROAD CORPORATION
-- ACQUISITION AND OPERATION EXEMPTION --
LINES OF I&M RAIL LINK, LLC**

**MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE SUPPLEMENT TO PETITION TO REVOKE**

On June 13, 2002, the Cooperating Labor Organizations ("CLO")¹ submitted a petition to stay the effective date of the above verified notice of exemption pending Board consideration of a concurrently filed petition to revoke the use of the class exemption. The Iowa, Chicago & Eastern Railroad Corporation ("IC&E") replied to both petitions on June 24, 2002. On June 27, 2002, the Board served an order staying the effective date of the use of the verified notice of exemption until July 26, 2002 pending issuance of a decision on CLO's petition for stay. Under the Board's rule contained at 49 C.F.R. § 1121.2, CLO's supplement to its petition to revoke is due on July 29, 2002. Due to an ongoing discovery dispute with IC&E, CLO respectfully requests the Board to extend the time for CLO to file its supplement to a date 15 days following the close of discovery in this proceeding.

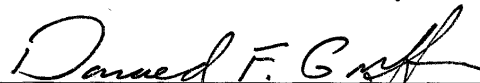
On July 2, 2002, the IC&E "responded" to CLO's interrogatories and document production requests. The responses were, in CLO's opinion, inadequate and evasive.

¹The members of CLO are identified in the Petition for Stay (CLO-1).

Consequently, other counsel for CLO are preparing and will serve motions to compel upon IC&E today. CLO incorporates herein the arguments raised in CLO's motion to compel (CLO-3) as to why the preparation of a supplement to the petition to revoke cannot be filed by July 29, 2002. The discovery dispute concerns IC&E's lack of responsiveness to CLO's discovery requests addressed to the "real party in interest" and "indicia of independence" issues raised in the initial petition to revoke. Until this dispute is resolved, CLO simply cannot make an adequate supplement to its petition.

WHEREFORE, CLO respectfully requests the Board to grant this motion and issue an order providing that CLO's supplement to its petition to revoke is due 15 days following the close of discovery in this proceeding.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Donald F. Griffin", is written over a horizontal line.

Donald F. Griffin
Asst. General Counsel - BMW

an attorney for CLO

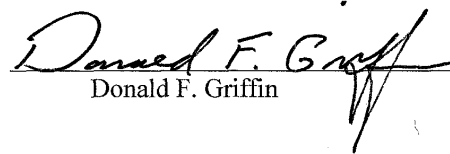
Dated: July 15, 2002

Certificate of Service

I hereby certify that today I served a copy of the foregoing Supplement to Petition for Stay to the following parties by overnight mail delivery:

William C. Sippel, Esq.
FLETCHER & SIPPEL LLC
Two Prudential Plaza, Suite 3125
180 North Stetson Avenue
Chicago, Illinois 60601-6721

and to all other parties by first class mail delivery.


Donald F. Griffin

Dated: July 15, 2002