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June 30, 2021

Via Electronic Filing

302649

**Cynthia T. Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
Patriot's Plaza 1
395 E Street SW
Washington, D.C. 20423-0001**

ENTERED
Office of Proceedings
June 30, 2021
Part of
Public Record

RE: FD 36473- W&P Development Corporation; WW Champion
Developments Inc and SJRE-Railroad Series- Petition for
Declaratory Order.

And

FD 35996 San Jacinto Transportation Company, Inc.
Operations Exemption SJRE Railroad Series

REQUEST FOR AN EXTENSION OF TIME

Dear Ms. Brown

This office represents the San Jacinto Transportation Company,
Inc.

On June 25, 2021 we were served with a Verified Petition to
Reject and a Verified Petition for a Declaratory Order in the above
noted Finance Dockets.

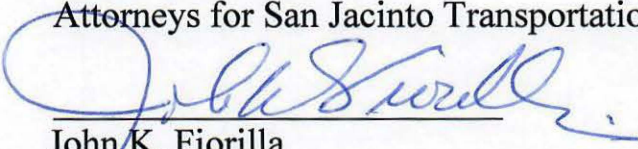
The filing was very specific and over 54 pages of detail. In our
first review we noted some items that we strongly disagree with
and that we would like to rebut with a detailed reply.

With clients and attorneys scheduled for their first vacations since the beginning of the pandemic a detailed reply which we feel the board should be given will be very difficult to complete by July 15. This matter is related to a civil proceeding in Harris County, Texas. Because of this parallel civil proceeding, which involves many related facts and legal issues the reply will be more complicated than most.

Under these circumstances we would appreciate the Board granting a thirty-day extension until August 16, 2021 to file our reply in this matter.

Thank you for your time and attention.

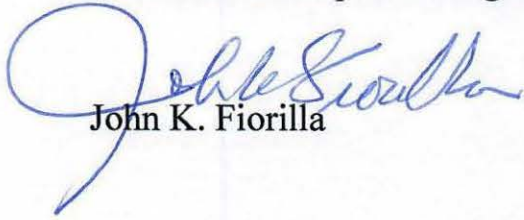
Sincerely,
Dyer & Peterson PC
Attorneys for San Jacinto Transportation Company


John K. Fiorilla

Cc: Robert A. Wimbish, Esq and Thomas J. Healey, Esq – Attorneys for W&P Development Corporation, WW Champion Developments, Inc and SJRE-Railroad Series
Baxter Wellmon, President, San Jacinto Transportation Company

Certification of Service

I hereby certify that I have this day served copies of this document upon all parties of record in this proceeding electronically.

A handwritten signature in blue ink, appearing to read "John K. Fiorilla", is written over the printed name.

John K. Fiorilla

June 30, 2021