

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

UNION PACIFIC RAILROAD COMPANY v. BNSF RAILWAY COMPANY	311510 ENTERED Office of Chief Counsel Docket No. NOR 42188 May 29, 2026 Part of Public Record
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UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND

BNSF Railway Company (“BNSF”) respectfully moves to extend the due date to respond to the Complaint filed by Union Pacific Railroad Company (“Union Pacific”) in the above-captioned docket until June 25, 2026. The Complaint was filed on May 15, 2026, and under 49 C.F.R. § 1111.5(c), BNSF’s answer would otherwise be due on June 4, 2026. There is good cause for a brief extension of 21 days until June 25, 2026, which would allow BNSF and its counsel sufficient time to prepare an answer to the Complaint that would aid the Board in its consideration of this matter. Undersigned counsel has consulted with counsel for Union Pacific, and Union Pacific does not object to this motion.

Respectfully submitted,

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Dated: May 29, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2026, I served a copy of the foregoing Unopposed Motion for Extension of Time to Respond to be served electronically or by first-class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ Tara Woods
Tara Woods