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EXPEDITED CONSIDERATION REQUESTED

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. FD 36844

COMMUTER RAIL DIVISION OF THE
REGIONAL TRANSPORTATIONAL AUTHORITY D/B/A METRA
—TERMINAL TRACKAGE RIGHTS—
UNION PACIFIC RAILROAD COMPANY

ENTERED
Office of Proceedings
March 14, 2025
Part of
Public Record

UNOPPOSED MOTION FOR EXTENSION OF TIME

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Union Pacific Railroad Company (Union Pacific) hereby submits this unopposed motion to extend the time to file a reply to the application for terminal trackage rights served March 7, 2025, by the Commuter Rail Division of the Regional Transportation Authority d/b/a Metra (Metra) by 30 days—that is, until April 28, 2025.

The Board’s rules provide the Board may grant extensions of time “in its discretion, upon request and for good cause.” 49 C.F.R. § 1104.7(b). Good cause exists to grant the requested extension because Metra’s application raises significant threshold questions about the Board’s general jurisdiction under 49 U.S.C. § 10501 and its specific jurisdiction over the lines at issue under 49 U.S.C. § 11102. Replying to the application may be further complicated by the fact that Metra has filed a parallel action in federal district court asserting a contractual right to operate over the lines at issue.

Counsel for Union Pacific have conferred with Counsel for Metra and are authorized to represent that Metra consents to this extension request.

Union Pacific also requests expedited consideration of this motion because the deadline for submitting a reply is in just 13 days.

Respectfully submitted,

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March 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2025, I caused a copy of the foregoing document to be served by email on all parties of record in Docket No. FD 36844.

/s/ Michael L. Rosenthal