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October 15, 2026

Hon. Jenifer J. Soulikias
Administrative Law Judge
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

Re: *Docket No. FD 36873 - Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company*

Dear Judge Soulikias:

Grand Trunk Corporation and its U.S. rail operating subsidiaries[1] (collectively, "CN") respectfully move to withdraw without prejudice their motion for declaratory relief (CN-33).

CN, BNSF, CPKC, and CSXT have reached a tentative agreement on how to manage the allocation of time at Applicant depositions going forward. CN otherwise reserves all rights to recall Mr. Gehringer and to seek emergency relief before the ALJ should any further issues arise that prejudice CN's ability to engage in discovery in this proceeding.

[1] Bessemer and Lake Erie Railroad Company, Cedar River Railroad Company, Chicago, Central & Pacific Railroad Company, Grand Trunk Western Railroad Company, Illinois Central Railroad Company, Iowa Northern Railway Company, The Pittsburgh & Conneaut Dock Company, and Wisconsin Central Ltd.

Respectfully submitted,

/s/ Sara Y. Razi

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Attorneys for CN

CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of October, 2026, I caused a true and correct copy of the foregoing to be served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General, and Administrative Law Judge Jenifer Soulikias.

/s/ Andrew Bernstein
Andrew Bernstein
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