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BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 32760, SUB FILE 45



IN THE MATTER OF ARBITRATION BETWEEN UNION PACIFIC RAILROAD
COMPANY AND BROTHERHOOD OF LOCOMOTIVE ENGINEERS & TRAINMEN

(Arbitration Review)

CARRIER'S MOTION FOR EXTENSION OF TIME
TO FILE APPEAL FROM ARBITRATION AWARD

COMES NOW Union Pacific Railroad Company (hereinafter "Carrier"), by and through counsel, and moves this Board to permit Carrier an additional 30 days, or until February 15, 2008, to file its appeal from the award of Arbitrator Robert Perkovich, in the above-referenced docket. In support of this Motion, the Carrier states as follows:

1 This matter arises out of a dispute between the Carrier and the Brotherhood of Locomotive Engineers & Trainmen ("BLET") regarding the Carrier's right to establish interdivisional service between Houston, Texas, and several other locations in Texas. The dispute involves important and complex issues regarding the interplay between the 1986 BLET National Agreement and the Houston Hub Merger Implementing Agreement ("Hub Merger Agreement") that was negotiated to implement the economies and efficiencies made possible, as well as the labor protections required, by the Board's approval of the merger between the Carrier and Southern Pacific in Union Pacific Corp – Control and Merger – Southern Pacific Transp Co., STB Finance Docket No 32760 (served August 12, 1996)

2. A tripartite arbitration board was created to resolve the dispute. Gilbert Gore was selected as the BLET member of the arbitration board, Sharon Boone was selected as the Carrier member of the arbitration board, and Arbitrator Perkovich was assigned by the National Mediation Board as the Chairman of the arbitration board.

3. On December 18, 2007, Arbitrator Perkovich sent an award to Mr. Gore and Ms. Boone that was favorable to BLET. Arbitrator Perkovich's award was signed by him and contained blank spaces for the signatures of Mr. Gore and Ms. Boone.

4. On December 27, 2007, Mr. Gore signed the award. Mr. Gore's signature on the award made it final and subject to appeal.

5. Under 49 C.F.R. § 1115.8, an appeal of Arbitrator Perkovich's award is due 20 days after it became final, unless that date is extended by the Board. Thus, the current deadline for the Carrier's appeal is January 16, 2008.

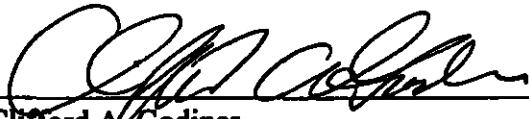
6. Due to the Christmas and New Year's holidays, as well as other pressing business of Carrier officials and the undersigned counsel, the Carrier has not and will not have the ability to draft and complete the necessary appeal paperwork by the current January 16, 2008, deadline.

7. For these reasons, and because of the complexity and importance of the issues presented, the Carrier respectfully requests 30 additional days, to and including February 15, 2008, in which to file its notice of appeal. This extension is necessary to allow Carrier to properly present its appeal.

WHEREFORE, Carrier Union Pacific Railroad Company respectfully requests the Surface Transportation Board to enter an Order granting an additional 30 days, to and including February 15, 2008, to file its appeal and for such other relief as is warranted.

Respectfully submitted,

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Attorney for Carriers

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon Gilbert Gore, 1448 MacArthur Avenue, Harvey, Louisiana 70058, by United States Mail, first class postage prepaid, this 10th day of January 2008.

