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## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Authorization of Norfolk Southern Railway to	:	Case No. 18-1616-RR-FED
Upgrade Active Warning Devices in	:	<u>REQUEST TO EXTEND</u>
the City of Alliance, in Stark County.		<b>CONSTRUCTION DEADLINE</b>
	:	
		D. Casey Talbott (0046767)
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	:	
		Attorneys for Norfolk Southern
	:	Railway Company

Norfolk Southern Railway Company ("NSRC") respectfully requests an additional extension of time of thirty (30) days – through January 27, 2020 – within which to complete the involved construction project at the Union Avenue grade crossing (DOT #503013S) in Alliance, Stark County.

5087965.1

A memorandum in support is attached.

Respectfully submitted,

EASTMAN & SMITH LTD.

/s/ D. Casey Talbott

D. Casey Talbott One SeaGate, 24<sup>th</sup> Floor P.O. Box 10032 Toledo, Ohio 43699-0032 Telephone: (419) 241-6000 Fax: (419) 247-1777 Email: dctalbott@eastmansmith.com

Attorneys for Norfolk Southern Railway Company

## MEMORANDUM IN SUPPORT

Due primarily to the holidays (with related work stoppage), NSRC respectfully

requests an additional extension of time of thirty (30) days – through January 27, 2020 – within which to complete this project.

Respectfully submitted,

EASTMAN & SMITH LTD.

/s/ D. Casey Talbott

D. Casey Talbott One SeaGate, 24<sup>th</sup> Floor P.O. Box 10032 Toledo, Ohio 43699-0032 Telephone: (419) 241-6000 Fax: (419) 247-1777 Email: dctalbott@eastmansmith.com

Attorneys for Norfolk Southern Railway Company

## **PROOF OF SERVICE**

A copy of the foregoing **Request to Extend Construction Deadline** was filed electronically with the Commission this 27<sup>th</sup> day of December, 2019. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

<u>/s/ D. Casey Talbott</u> Attorney for Norfolk Southern Railway Company This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/27/2019 3:43:22 PM

in

Case No(s). 18-1616-RR-FED

Summary: Request Request to Extend Construction Deadline electronically filed by Mr. D. Casey Talbott on behalf of Norfolk Southern Railway Company