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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Authorization of Norfolk Southern Railway to Install New Active Warning Devices at Four Grade Crossings in the City of Dayton, Montgomery County.	:	Case No. 17-1508-RR-FED
	:	<u>AMENDED REQUEST TO</u>
	:	<u>EXTEND CONSTRUCTION</u>
	:	<u>DEADLINE</u>
	:	D. Casey Talbott (0046767)
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	:	Attorneys for Norfolk Southern Railway Company

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Norfolk Southern Railway Company (“NSRC”) respectfully amends its Extension Request of November 1, 2018 so as to include the Findlay Street grade crossing (DOT #527819M), as well.

A memorandum in support is attached.

Respectfully submitted,

EASTMAN & SMITH LTD.

/s/ D. Casey Talbott

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MEMORANDUM IN SUPPORT

On November 1, 2018, NSRC filed a request to extend through December 15, 2018 the deadline to complete construction at the Stewart Street (DOT #524628S) and Miami Chapel Road (DOT #524629Y) grade crossings. At that point, NSRC was under the impression that it would be able to accomplish cut-in at the Irwin Street (DOT #527818F) and Findlay Street grade crossings within the currently-assigned deadline, of December 15, 2018. Irwin was in fact cut-in, as of November 5, 2018, so within the currently-assigned deadline. Unfortunately, a number of concerns (unforeseen utility conflicts, etc.) have arisen at the Findlay Street grade crossing, thereby necessitating its inclusion in the instant extension request.

For the foregoing reasons, and at least at this point, NSRC respectfully requests that the construction deadline for the Stewart, Miami Chapel, and Findlay grade crossings be extended through December 15, 2018. In the meantime, NSRC will keep the PUCO apprised of its progress

at each of these projects, including its ongoing effort to resolve outstanding utility conflicts at Stewart and Findlay.

Respectfully submitted,

EASTMAN & SMITH LTD.

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PROOF OF SERVICE

A copy of the foregoing **Amended Request to Extend Construction Deadline** was filed electronically with the Commission this 14th day of November, 2018. 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.

/s/ D. Casey Talbott

Attorney for Norfolk Southern
Railway Company

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Case No(s). 17-1508-RR-FED

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