BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the Joint Petition of Norfolk Southern Railway Company and | : | Case No. 19-180-RR-UNC |
|--|---|-------------------------------------|
| CSX Transportation, Inc. to Close the | : | PRE-FILED TESTIMONY OF |
| Franklin Street Crossings (DOT Nos. | | CATHERINE STOUT, ORDC |
| 481482D & 518257V) in Orange | : | MANAGER GRADE CROSSING |
| Township, Delaware County. | | SAFETY PROGRAMS (RETIRED) |
| - | : | |
| | | D. Casey Talbott (0046767) |
| | : | (Counsel of Record) |
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| | | Norfolk Southern Railway Company |
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Petitioners Norfolk Southern Railway Company and CSX Transportation, Inc., by

agreement of the parties, intend to offer into evidence certain portions of the sworn testimony of Catherine Stout (now retired, but formerly the Manager Grade Crossing Safety Programs for the Ohio Rail Development Commission), as provided in her deposition taken January 22, 2021. Petitioners request that all of Ms. Stout's testimony be made a part of the record of this hearing. Petitioners also reserve the right, and respectfully request permission, to read into the record certain key portions of Ms. Stout's testimony. These portions will be identified at the time of hearing, but may include:

- Page 8 line 2 through page 21 line 17;
- Page 30 line 16 through page 31 line 7; and
- Page 46 line 3 through page 56 line 11.

A copy of Ms. Stout's deposition transcript has been filed with the Commission.

Respectfully submitted,

<u>/s/ R. Leland Evans</u> R. Leland Evans (0006833) (Trial Attorney) Richard J. Silk, Jr. (0074111) DICKIE, MCCAMEY & CHILCOTE, P.C. 250 Civic Center Dr., Suite 280 Columbus, Ohio 43215 Telephone: (614) 258-6000 Facsimile: (614) 258-6006 <u>revans@dmclaw.com</u> rsilk@dmclaw.com

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/s/ D. Casey Talbott_

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Attorneys for Co-Petitioner Norfolk Southern Railway Company

CERTIFICATE OF SERVICE

A copy of the foregoing **Pre-Filed Testimony of Catherine Stout, ORDC Manager Grade Crossing Safety Programs (Retired)** was filed electronically with the Commission this 5th day of October, 2021. Notice of this filing will be sent by operation of the Commission's+ electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Commission's system.

/s/ D. Casey Talbott

D. Casey Talbott Attorney for Co-Petitioner Norfolk Southern Railway Company This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 19-0180-RR-UNC

Summary: Testimony Pre-Filed Testimony of Catherine Stout, ORDC Manager Grade Crossing Safety Programs (Retired) electronically filed by Mr. D. Casey Talbott on behalf of Talbott, D. Casey Mr. and Norfolk Southern Railway Company