# **MULLINS LAW GROUP PLLC**

Transportation Solutions for the 21<sup>st</sup> Century

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November 15, 2024

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ENTERED Office of Proceedings November 15, 2024 Part of Public Record

VIA E-FILING Cynthia T. Brown, Chief Section of Administration, Office of Proceedings Surface Transportation Board 395 E Street, SW Washington DC 20423-0001

Re: <u>Richmond Waterfront Industrial Park, LLC – Petition for Declaratory Order</u>, FD 36710

Dear Ms. Brown:

Philadelphia Belt Line Railroad Company hereby submits an Unopposed Motion To Extend Procedural Schedule in the above proceeding. If there are any questions about this matter, please contact me directly, either by telephone: 202-663-7823 or by e-mail: wmullins@mullinslawgroup.net.

Respectfully submitted,

<u>/ss/ William A. Mullins</u> William A. Mullins Attorney for Philadelphia Belt Line Railroad Company

Enclosures

cc: Parties of Record



## BEFORE THE SURFACE TRANSPORTATION BOARD

### **DOCKET NO. FD 36710**

## RICHMOND WATERFRONT INDUSTRIAL PARK, LLC – PETITION FOR DECLARATORY ORDER

### **UNOPPOSED MOTION TO EXTEND PROCEDURAL SCHEDULE**

Pursuant to 49 C.F.R. §1104.7(b), Petitioner, Philadelphia Belt Line Railroad Company (PBL), submits this motion for an extension of the due date for PBL to reply to Richmond Waterfront Industrial Park, LLC's (RWIP) Opening Statement, which was filed on October 15, 2024 and for a corresponding extension to the due date for RWIP to file its rebuttal. Pursuant to the procedural schedule established by the Surface Transportation Board in its stamped decision issued on October 1, 2024, PBL's reply is currently due November 22, 2024 and RWIP's rebuttal is currently due December 23, 2024. Pursuant to this motion, PBL is requesting that the date for PBL's reply be set to December 6, 2024 and that RWIP's rebuttal due date be set to January 6, 2025. The extensions are necessary to accommodate various involved parties' holiday schedules, the retirement of one of RWIP's attorneys at the end of 2024, and to provide an opportunity for possible settlement discussions. Counsel for PBL is authorized to state that RWIP does not oppose this motion. Accordingly, RWIP respectfully requests that the remaining procedural schedule for this proceeding be amended to allow PBL to file its reply on December 6, 2024 and for RWIP to file its rebuttal on January 6, 2024.

Respectfully submitted,

/ss/ William A. Mullins

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Dated: November 15, 2024

Counsel for Philadelphia Belt Line Railroad Company