

BEFORE THE SURFACE TRANSPORTATION BOARD

Great Redwood Trail Agency -)
Adverse Abandonment -) AB 1305 (Sub-No. 1)
Mendocino Railway in Mendocino)
County, CA)

**REPLY TO GRТА'S OPPOSITION
TO TRANSDEF'S MOTION TO STRIKE**

The Transportation Solutions Defense and Education Fund ("TRANSDEF") respectfully requests the Board accept this very short Reply, in the interests of having a complete record:

The Great Redwood Trail Agency filed an Objection yesterday to TRANSDEF's Motion to Strike the Marie Jones Verified Statement 3 and its appendices. The principal argument offered was that:

Contrary to TRANSDEF's assertions that Marie Jones lacks adequate professional experience, the Jones VS outlines in detail the breadth and depth of Marie Jones' experience and the methodology of the attached Feasibility & Market Analysis, on which her conclusions are based. Jones VS 2-4. (Objection at 3.)

TRANSDEF filed its Motion to Strike after recognizing that none of Ms. Jones' lengthy experience is relevant to conducting an analysis of freight demand. She has no rail freight economics experience that would justify reliance on her so-called expert report. Since purported expertise is the sole reason her report was included in GRТА's Application, it is therefore entirely appropriate under 49 C.F.R. § 1104.8 to request the Marie Jones materials be struck as irrelevant and immaterial to this proceeding.

On the basis of this Reply and its Motion to Strike, TRANSDEF respectfully requests the Board grant its motion to strike Marie Jones' Verified Statement 3 and its Appendices. I certify that all parties to this proceeding, as of today, have been served this Reply to GRТА'S Opposition to TRANSDEF'S Motion to Strike.

Dated: July 6, 2024

Respectfully submitted,

/s/ DAVID SCHONBRUNN

David Schonbrunn, President