

WATERS, MCPHERSON, MCNEILL

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
300 LIGHTING WAY
P.O. Box 1560
SECAUCUS, NEW JERSEY 07096

DANIEL E. HORGAN
MEMBER OF N.J., N.Y. & D.C. BARS

OFFICE DIRECT DIAL: 201-330-7453
CELL and VOICE MAIL: 201-926-4402
E-MAIL dehorgan@lawwmm.com

March 4, 2015

237884
237885

E-Filed through stb.dot.gov

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

ENTERED
Office of Proceedings
March 4, 2015
Part of
Public Record

**RE: Conrail Abandonment in Hudson County, AB-167-1189-X;
Petition for Declaratory Order, FD35825;
Parcel Map Exhibit Request**

Dear Ms. Brown,

On or about January 24, 2015 in AB-167-1189-X, the City of Jersey City filed a motion identified for filing as STB ID 237549 to which was attached as a color exhibit, a "Parcel Map". Today we transmitted a motion to the Board by overnight delivery service for filing in FD35825 that contains a copy of that same Parcel Map. Our request to the Board is that the original of the Parcel Map, or a fully accurate color copies of that original, be required from Jersey City for the Board's consideration of both of the aforesaid motions.

The reason for this request is that we found that the copy of this Parcel Map displayed on the Board's website was different in color rendering and had less contrast and detail than the hard copy of the Parcel Map served upon us by mail with the City's January motion. In our motion sent for filing today we noted in the cover letter that we would formally request that Counsel for Jersey City file fully color-accurate copies with the Board and serve the same on all parties. We are concerned that the detail on the copy we received may not be reproduced accurately for the Board or its staff in their

consideration of these motions. The details of certain rail lines presented in the Parcel Map necessary for a full and proper analysis may not be available to some or all of the recipients, including the Board, due to poor quality in copying or electronic transmission.

By copy of this letter to Charles Montange, Esq. we are requesting that he provide fully accurate color copies of the Parcel Map to the Board and all parties of record in both proceedings. We are asking that the Board consider those copies in its action on the aforesaid motions. If Mr. Montange is not in possession of the original, which had reportedly been prepared by the Hudson County Division of Planning, we request that agency be asked to produce the original Parcel Map for accurate copying and distribution.

Thank you for your attention to this matter.

Very truly yours,

WATERS, McPHERSON, McNEILL, P.C.

BY:



DANIEL E. HORGAN

CC: **All parties on service list** (to include Massiel Ferrara, PP, AICP, Director, Hudson County Division of Planning who is on the Service List provided by Mr. Montange).

CERTIFICATION

I hereby certify that copies of this letter are concurrently being served upon all persons and entities on the service list in both captioned matters by First Class United States Mail.

S/Daniel E. Horgan

Daniel E. Horgan

March 4, 2015