

May 28, 2015 that it intends to seek authority to abandon the entire Towner Line sometime this summer. These actions and understandings have led to the dismissal of the Colorado court proceeding, and could ultimately lead to the dismissal of the Complaint in this proceeding.

Accordingly, the parties jointly request the Board to issue an order staying further proceedings, including the postponement of the procedural schedule served on June 25, 2015, to and including August 7, 2015, by which date V&S anticipates filing a Verified Notice of Exempt Abandonment in Docket No. AB 603 (Sub-No. 4) to seek authority to abandon the entire Towner Line. If V&S files its Notice of Exempt Abandonment in Docket No. AB 603 (Sub-No. 4) on or before August 7, 2015, the parties respectfully jointly request that the stay of proceedings remain in effect until the conclusion of the abandonment proceeding, including, if one is filed, the conclusion of an offer financial assistance to avoid the Towner Line's abandonment, pursuant to 49 U.S.C. §10904 and 49 C.F.R. §1152.27.

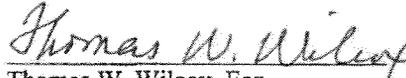
In the event that V&S does not file a petition to abandon the entire Towner Line, or a notice of exemption to abandon the entire Towner Line on or before August 7, 2015, the parties will either jointly or individually inform the Board of this fact and request that the stay be lifted and the procedural schedule in this case be reinstated, with the dates adjusted appropriately to account for the length of the stay.



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