

LAW OFFICE  
**THOMAS F. MCFARLAND, P.C.**  
208 SOUTH LASALLE STREET - SUITE 1890  
CHICAGO, ILLINOIS 60604-1112  
TELEPHONE (312) 236-0204  
FAX (312) 201-9695  
*mcfarland@aol.com*

THOMAS F. MCFARLAND

April 15, 2015



By UPS overnight mail

Ms. Cynthia T. Brown, Chief  
Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20024

238219  
ENTERED  
Office of Proceedings  
April 16, 2015  
Part of  
Public Record

Re: Docket No. AB-1232, *Town of North Judson, Indiana -- Adverse Discontinuance of Service -- in LaPorte, Porter, and Starke Counties, IN*

**TRANSMITTAL LETTER AND PETITION FOR WAIVER OF FILING FEE**

Dear Ms. Brown:

Hereby forwarded for filing with the Board are the original and 10 copies of a Petition for Waiver and Exemption in Conjunction with a Prospective Application for Adverse Discontinuance of Service in the above proceeding.

Also forwarded is a check for \$1,900 payable to the Board to cover the filing fee. However, the Town of North Judson, Indiana (the Town) hereby respectfully petitions for waiver of that filing fee and return of the check.

Waiver of the filing fee and return of the check are warranted under 49 C.F.R. § 1002.2(e)(1), which provides for waiver of filing fees for an application or other document filed by a local government entity. The Town of North Judson is such a local government entity.

In *Regulations Governing Fees For Services - Policy Statement*, 5 S.T.B. 352 (2000), the Board adopted a policy of not waiving filing fees for local government entities when such entities are acting in the capacity of a carrier, but the Board made it clear that such policy does not prevent waiver when such a local government entity is attempting to facilitate continued rail service, so that it is not acting in the capacity of a rail carrier and, in particular, when the local governmental entity files an application for adverse abandonment or discontinuance of service, viz, at 355, emphasis added:

FILED  
April 16, 2015  
SURFACE  
TRANSPORTATION BOARD

FEE RECEIVED  
April 16, 2015  
SURFACE  
TRANSPORTATION BOARD

Ms. Cynthia T. Brown  
April 15, 2015  
Page 2

We are not, through this policy, seeking to inhibit parties from using our processes . . . by which, for example, local bodies attempt to facilitate continued rail service . . . The fee waiver will be available to a state or local government entity that is not acting in the capacity of a carrier . . . Thus, for example, a state or local entity filing an adverse (or third party) abandonment proposal would benefit from the waiver rule because the filer would not be appearing as a carrier . . .

Inasmuch as the filing fee is to be waived for the Town's contemplated Application for Adverse Discontinuance of Service, it follows logically that the filing fee is also to be waived for this Petition for Waiver and Exemption that is filed in contemplation of that Application.

The filing fee was waived for Petitions for Waiver of Board abandonment regulations filed by Riverview Trenton Railroad Company (2015 WL 1641518 at \*6, note 24, Docket No. AB 1230, decision served April 10, 2015), and by Lackawaxen-Honesdale Shippers' Association (2014 WL 257456 at \*5, note 6, Docket No. AB 1110, decision served January 23, 2014). The filing fee should also be waived as to the Town's Petition for Waiver and Exemption, which is indistinguishable from those Petitions.

Respectfully submitted,

Rachel Arndt  
TM

RACHEL ARNDT  
PETERSON WAGGONER & PERKINS, LLP  
125 E. Tenth Street  
Rochester, IN 46975  
(574) 223-4292  
rachel@peterson-waggoner.com

Tom McFarland

THOMAS F. McFARLAND  
THOMAS F. McFARLAND, P.C.  
208 South LaSalle Street, Suite 1890  
Chicago, IL 60604-1112  
(312) 236-0204  
(312) 201-9695 (fax)  
mcfarland@aol.com

*Attorneys for the Town of  
North Judson, Indiana*

TMcF:kl:1628\trSTB1

cc: John D. Heffner, Esq., *by first-class, U.S. mail and e-mail*  
Attorney for Chesapeake and Indiana Railroad Company, Inc.

BEFORE THE  
SURFACE TRANSPORTATION BOARD

---

TOWN OF NORTH JUDSON, INDIANA     )  
-- ADVERSE DISCONTINUANCE OF     ) DOCKET NO.  
SERVICE -- IN LAPORTE, PORTER,    ) AB-1232  
AND STARKE COUNTIES, IN            )

---

**PETITION FOR WAIVER AND EXEMPTION IN CONJUNCTION  
WITH PROSPECTIVE APPLICATION FOR ADVERSE  
DISCONTINUANCE OF SERVICE\***

---

TOWN OF NORTH JUDSON, INDIANA  
P.O. Box 56  
North Judson, IN 46366

Petitioner

RACHEL ARNDT  
PETERSON WAGGONER & PERKINS, LLP  
125 E. Tenth Street  
Rochester, IN 46975  
(574) 223-4292  
rachel@peterson-waggoner.com

THOMAS F. McFARLAND  
THOMAS F. McFARLAND, P.C.  
208 South LaSalle Street, Suite 1890  
Chicago, IL 60604-1112  
(312) 236-0204  
(312) 201-9695 (fax)  
mcfarland@aol.com

Attorneys for Petitioner

DATE FILED: April 16, 2015

\* EXPEDITED DISPOSITION IS RESPECTFULLY REQUESTED

BEFORE THE  
SURFACE TRANSPORTATION BOARD

---

TOWN OF NORTH JUDSON, INDIANA	)	
-- ADVERSE DISCONTINUANCE OF	)	DOCKET NO.
SERVICE -- IN LAPORTE, PORTER,	)	AB-1232
AND STARKE COUNTIES, IN	)	

---

**PETITION FOR WAIVER AND EXEMPTION IN CONJUNCTION  
WITH PROSPECTIVE APPLICATION FOR ADVERSE  
DISCONTINUANCE OF SERVICE**

---

Pursuant to 49 U.S.C. § 10502(a) and 49 C.F.R. § 1117.1, the Town of North Judson, Indiana (the Town) hereby respectfully petitions the Board for exemption from specified statutory provisions and for waiver of specified Board regulations in conjunction with an Application for Adverse Discontinuance of Service that it intends to file.

**JUSTIFICATION AND NEED FOR EXPEDITED DISPOSITION**

Expedited disposition of this Petition is justified because as a result of several recent Board decisions, it has become settled which statutory provisions are to be exempted and which Board regulations are to be waived in conjunction with applications for adverse discontinuance. *See, e.g., Riverview Trenton Railroad Company -- Adverse Abandonment -- in Wayne County, Mich.*, 2015 WL 1641518 (Docket No. AB 1230, decision served April 10, 2015) (“*Riverview*”); *Lackawaxen-Honesdale Shippers Assn. --Adverse Discontinuance of Operating Authority -- in Wayne and Pike Counties, PA*, 2014 WL 257456 (Docket No. AB 1110, decision served January 23, 2014) (“*Lackawaxen*”); and *Paulsboro Refining Company, LLC -- Adverse Abandonment -- in Gloucester County, NJ*, 2012 WL 3059232 (Docket No. AB 1095 [Sub-No. 1], decision served July 26, 2012) (“*Paulsboro*”). The Petition hereby filed by the Town seeks only the exemptions and waivers granted in those recent decisions. Thus, the exemptions and waivers sought by the

Town are routinely granted.

Expedited disposition is needed, and would be very much in the public interest, in order to facilitate an orderly transition of rail operations over the involved rail line with no interruption of service. This proceeding involves what the Board refers to as a “landlord-tenant dispute” (*see Paulsboro Refining Company, LLC -- Adverse Abandonment -- in Gloucester County, NJ*, 2014 WL 6774680 at \*3 [Docket No. AB 1095 [Sub-No. 1], decision served December 2, 2014]), in which the owner of a rail line is replacing an incumbent operator of the line at the expiration of the applicable operating agreement, and the incumbent operator is refusing to vacate the rail line to make way for a newly-selected operator. The Operating Agreement in the instant proceeding will expire by its terms on December 31, 2015. An expedited disposition granting the non-controversial exemptions and waivers here sought would enable the Town to file an Application for Adverse Discontinuance of the incumbent operator’s authority soon enough for the discontinuance to become effective prior to expiration of the Operating Agreement.

### **BACKGROUND**

Since 2004, the Town has owned a rail line that extends between Milepost CF 0.23 at LaCrosse and Milepost 15.23 at Wellsboro, and between Milepost 212.55 at North Judson and Milepost 230.92 at Malden, a total distance of approximately 33.37 miles in LaPorte, Porter, and Starke Counties, Indiana (the Rail Line). The Rail Line connects to Norfolk Southern Railway Company (NS) at Thomaston, IN, and connects to CSX Transportation, Inc. (CSX) at Wellsboro, IN. The Town acquired the Rail Line by means of an Offer of Financial Assistance in Docket No. AB-55 (Sub-No. 643X), *CSX Transp., Inc. -- Aband. Exempt. -- in LaPorte, Porter, and Starke Counties, IN*, 2004 WL \_\_\_\_\_, decision served May 14, 2004.

On August 31, 2004, the Town entered into a Railroad Operating Agreement with

Chesapeake & Indiana Railroad Company, Inc. (CKIN) for CKIN to operate the Rail Line. That Railroad Operating Agreement is scheduled to expire by its terms on December 31, 2015.

The Town intends to replace CKIN as operator of the Rail Line as of January 1, 2016, or as soon thereafter as possible. Accordingly, as of that date, the Town intends to enter into a new railroad operating agreement with an experienced Class III rail operator.<sup>1/</sup>

CKIN has made it known to the Town that CKIN will not voluntarily cease rail operations on the Rail Line as of expiration of the Railroad Operating Agreement. Accordingly, it will be necessary for the Town to file an Application with the Board for Adverse Discontinuance of CKIN's federal authority to operate over the Rail Line.

There are Board regulations and statutory provisions that require information in an application for discontinuance that is readily available to an operating rail carrier applicant, but not to an entity, such as the Town, that does not operate a rail line, but who must file an application for adverse discontinuance. Accordingly, the Town is petitioning the Board for exemption and waiver of such provisions and regulations.

### **REQUESTS FOR WAIVER AND EXEMPTION**

#### **1. System Diagram Map**

The Town hereby requests an exemption from 49 U.S.C. § 10903(c)(2), which requires rail carriers to maintain a system diagram map (SDM) that identifies rail lines planned for abandonment or discontinuance of service. The Town also requests a waiver of 49 C.F.R. § 1152.10-14, which relate to filing an SDM and related requirements, and 49 C.F.R. § 1152.22(a)(5), which requires reference to inclusion of the rail line subject to a discontinuance

---

<sup>1/</sup> Thus, termination of the Operating Agreement is based on expiration of the Agreement, not for cause.

request on the applicant's SDM, the date on which the rail line was first listed on that map, and a copy of the line description which accompanies the applicant's map.

The SDM requirements are customarily waived in adverse discontinuance proceedings where, as here, the adverse discontinuance is intended to result only in a change of operators. *See Lackawaxen* at \*2. Those requirements should likewise be waived in response to the Town's Petition.

## **2. Rail Line Attributes**

The Town hereby requests waiver of 49 C.F.R. § 1152.22(b), (c), (d), and (e) which require that discontinuance applications include information regarding condition of the properties, service performed, revenue and cost data, and rural and community impact. There is no point in requiring submission of that information where, as here, there will only be a change of operators and not a complete discontinuance of service. The revenue and cost data requirements are intended to apply only to carriers that seek to discontinue their own operation on the ground that such operations are a burden on interstate commerce.

Based on the foregoing, the requirements of the specified regulations are unnecessary as to the Town's Petition and accordingly should be waived. See, e.g., *Lackawaxen* at \*2.

## **3. Environmental and Historic Impacts**

The Town hereby requests waiver of the 49 C.F.R. § 1152.20(c), 49 C.F.R. § 1105.7, 49 C.F.R. § 1105.8, and any additional exemptions or waivers that may be necessary to confirm the inapplicability of environmental and historic reporting requirements in this proceeding. The waiver sought is appropriate because the proposed adverse discontinuance arises in the context of continued rail operations that would not result in significant changes that exceed the thresholds in 49 C.F.R. § 1105.7 and 49 C.F.R. § 1105.8.

Based on the foregoing, the specified regulations should be waived. See *Lackawaxen* at \*3; *Accord Salt Lake City Railroad Company, Inc. -- Adverse Abandonment -- Line of Utah Transit Authority in Salt Lake City, UT*, 1999 WL 673031 at \*3 (Docket No. AB 520, decision served August 26, 1999).

**4. Filing, Notice and Posting Requirements**

The Town hereby requests that this Petition for Exemption and Waiver be permitted to serve as the Notice of Intent under 49 C.F.R. § 1152.20. That request was granted under substantially similar circumstances in Riverview at \*3 and in *Lackawaxen* at \*3. That request should likewise be granted in response to this Petition.

The Town also requests that the following provisions that were exempted or waived in *Lackawaxen* be exempted or waived in response to this Petition (but no request for exemption or waiver is made as to provisions whose exemption or waiver was denied in *Lackawaxen*):

- 49 C.F.R. § 1152.20(a)(1) - filing Notice on the Board
- 49 C.F.R. § 1152.20(a)(2) - service of Notice on:
  - (v) - the Indiana Cooperative Extension Service
  - (vi) - the U.S. Department of Transportation, Federal Railroad Administration
  - (vii) - Department of Defense (Military Traffic Management Command, Transportation Engineering Agency, Railroads for National Defense Program)
  - (viii) - the U.S. Department of Interior (Recreation Resources Assistance Division)
  - (x) - the National Railroad Passenger Corporation (Amtrak)
  - (xi) - the U.S. Department of Agriculture, Chief of the Forest Service
- 49 C.F.R. § 10903(a)(3)(B), 49 C.F.R. § 1152.20(a)(3), and 49 C.F.R. § 1152.24(c) - posting of Notice of Intent at agency stations
- 49 C.F.R. § 1152.20(b)(1) - time limits for service of Notice of Intent

As reflected in the Certificate of Service in this Petition, *infra*, this Petition (Notice of Intent) is being served on representatives of the incumbent rail carrier, CKIN; the two active

shippers on the Rail Line (Co-Alliance and Kova Ag Products); the connecting rail carriers (NS and CSX); State officials (Governor, Indiana DOT, Indiana Utility Regulatory Commission); County officials (LaPorte Commissioners, Porter Commissioners, Starke Commissioners); The Hoosier Valley Railroad Museum; and rail labor (Railroad Retirement Board). That widespread service of Notice of an upcoming Application for Adverse Discontinuance of CKIN's rail operating authority, together with three consecutive weeks of newspaper notice in the affected Counties and Federal Register notice, clearly satisfies procedural due process.

**5. Offers of Financial Assistance and Public Use Conditions**

The Town hereby seeks exemptions from 49 U.S.C. § 10904 and 49 U.S.C. § 10905 and waiver of corresponding regulations at 49 C.F.R. § 1152.27 and C.F.R. § 1152.28 governing Offers of Financial Assistance and Public Use conditions, respectively. Because the involved rail line will continue to be operated, those provisions would serve no useful purpose, and are not necessary to carry out the national rail policy.

Based on the foregoing, exemptions from 49 U.S.C. § 10904 and 49 U.S.C. § 10905 and waiver of 49 C.F.R. § 1152.27 and C.F.R. § 1152.28 should be granted. *See Riverview* at \*5 and *Lackawaxen* at \*4.

**6. Exemption Criteria**

As to the statutory provisions sought to be exempted in response to this Petition, the Board is hereby requested to find that compliance with such provisions is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101, nor is such compliance necessary to protect shippers on the Rail Line from abuse of market power. The Board is also requested to find that exemption from such provisions will promote the national rail policy by eliminating unnecessary procedures, thereby expediting regulatory decisions consistently with 49 U.S.C. §

10101(2), and will foster sound economic conditions in rail transportation consistently with 49 U.S.C. § 10101(5).

**7. Federal Register Notice**

The Town hereby requests waiver of the notice requirements at 49 C.F.R. § 1152.22(i) to permit deviation from the prescribed form of notice set forth in that regulation by explaining in the notice that the Application is for an adverse (involuntary) discontinuance of service by CKIN to be followed, if granted, by continuation of rail service over the Line by a replacement rail operator. (See wording in attached Appendix 1). This requested waiver is routinely granted. See *Paulsboro* at \*5.

**CONCLUSION AND REQUESTED RELIEF**

WHEREFORE, for the reasons stated, the Board should grant the requested exemptions and waivers.

Respectfully submitted,

TOWN OF NORTH JUDSON, INDIANA  
P.O. Box 56  
North Judson, IN 46366

Petitioner

  
RACHEL ARNDT <sup>TM</sup>  
PETERSON WAGGONER & PERKINS, LLP  
125 E. Tenth Street  
Rochester, IN 46975  
(574) 223-4292  
rachel@peterson-waggoner.com

  
THOMAS F. McFARLAND  
THOMAS F. McFARLAND, P.C.  
208 South LaSalle Street, Suite 1890  
Chicago, IL 60604-1112  
(312) 236-0204  
(312) 201-9695 (fax)  
mcfarland@aol.com

Attorneys for Petitioner

DATE FILED: April 16, 2015

**DRAFT FEDERAL REGISTER NOTICE**

On or about \_\_\_\_\_, 2015, the Town of North Judson, Indiana (the Town) intends to file with the Surface Transportation Board (STB), Washington, DC 20423, an Application for Adverse Discontinuance of Service by Chesapeake & Indiana Railroad Company, Inc. (CKIN) over a line of railroad owned by The Town that extends between Milepost CF 0.23 at or near LaCrosse and Milepost 15.23 at or near Wellsboro, and between Milepost 212.55 at or near North Judson and Milepost 230.92 at or near Malden, a total distance of approximately 33.37 miles in LaPorte, Porter, and Starke Counties, Indiana (the Rail Line). The Rail Line traverses through United States Postal Service ZIP Codes 46382, 46383, 46348, 46366, 46340, and 46390. The Rail Line includes the stations of LaCrosse, Wellsboro (connection to CSX Transportation, Inc.), North Judson, Malden, Hanna, English Lake, Union Mills, and Thomaston (connection to Norfolk Southern Railway Company). Based on information in the Town's possession, the Rail Line does not contain federally granted rights-of-way. Any documentation in the Town's possession will be made available promptly to those requesting it.

The Application for Adverse Discontinuance of Service is being filed to terminate CKIN's federal operating authority over the Rail Line because the Town, as owner of the Rail Line, has decided not to renew its Operating Agreement with CKIN when that Agreement expires by its terms on December 31, 2015, and because CKIN has made it known that it will not voluntarily vacate the Rail Line as of that date to make way for a new rail operator. If the Application were to be granted, the Town would utilize State Court remedies to evict CKIN from the Rail Line and would arrange for continued rail service on the Line by means of a new operating agreement with a replacement rail operator. The Town will utilize all legal means to avoid an interruption of rail service over the Line.

The interest of railroad employees will be protected by the labor protective conditions imposed in *Oregon Short Line Railroad - Abandonment, Goshen Branch*, 360 ICC 91 (1979).

Any interested person, after the Application is filed on or about \_\_\_\_\_, 2015, may file with the STB written comments concerning the proposed adverse discontinuance, or protests against it. Those filings are due 45 days from the date of filing of the Application. Interested persons should be aware that inasmuch as rail service will continue over the Line following adverse discontinuance of CKIN's rail operations, offers of financial assistance under 49 U.S.C. § 10904 or requests for public use conditions under 49 U.S.C. § 10905 will not be entertained. Persons who may oppose the discontinuance but who do not wish to participate fully in the process by appearing at any oral hearings or by submitting verified statements of witnesses, containing detailed evidence, should file comments. Persons opposing the proposed

adverse discontinuance who do wish to participate actively and fully in the process should file a protest. Protests must contain that party's entire case in opposition (case in chief) including the following:

- (1) Protestant's name, address and business.
- (2) A statement describing protestant's interest in the proceeding, including:
  - (i) A description of protestant's use of the line;
  - (ii) If protestant does not use the line, information concerning the group or public interest it represents;
  - (iii) If protestant's interest is limited to the retention of service over a portion of the line, a description of the portion of the line subject to protestant's interest (with milepost designations if available).
- (3) Specific reasons why protestant opposes the application including information regarding protestant's reliance on the involved service [this information must be supported by affidavits of persons with personal knowledge of the fact(s)].
- (4) Any rebuttal of material submitted by applicant.

In addition, a commenting party or protestant may provide a statement of position and evidence regarding:

- (i) Environmental impact;
- (ii) Impact on rural and community development;
- (iii) Prospective use of the right-of-way for interim trail use and rail banking under 16 U.S.C. 1247(d) and § 1152.29.

A protest may demonstrate that: (1) the protestant filed a feeder line application under 49 U.S.C. § 10907; (2) the feeder line application involves any portion of the rail line involved in the abandonment or discontinuance application; (3) the feeder line application was filed prior to the date the abandonment or discontinuance application was filed; and (4) the feeder line application was pending before the Board.

Written comments and protests will be considered by the Board in determining what disposition to make of the application. The commenting party or protestant may participate in the proceeding as its interests may appear.

If an oral hearing is desired, the requester must make a request for an oral hearing and provide reasons why an oral hearing is necessary. Oral hearing requests must be filed with the Board no later than 10 days after the application is filed.

Those parties filing protests to the proposed discontinuance should be prepared to participate actively either in an oral hearing or through the submission of their entire opposition case in the form of verified statements and arguments at the time they file a protest. Parties seeking information concerning the filing of protests should refer to 49 C.F.R. §1152.25.

Written comments and protests, including all requests for trail use conditions, should indicate the proceeding designation STB No. AB-1232 and must be filed with the Chief, Section of Administration, Office of Proceedings, Surface Transportation Board, Washington, DC 20423-0001, no later than 45 days after the date on when the Application is filed. Interested persons may file a written comment or protest with the Board to become a party to this discontinuance proceeding. A copy of each written comment or protest shall be served upon the representatives of the applicant, Rachel Arndt, Peterson Waggoner & Perkins, LLP, 125 E. Tenth Street, Rochester, IN 46975, (574) 223-4292 and Thomas F. McFarland, Thomas F. McFarland, P.C., 208 South LaSalle Street, Suite 1890, Chicago, IL 60606-1112, (312) 236-0204. The original and 10 copies of all comments or protests shall be filed with the Board with a certificate of service. Except as otherwise set forth in part 1152, each document filed with the Board must be served on all parties to the discontinuance proceeding. 49 C.F.R. § 1104.12(a).

A copy of the application is being sent by first class mail to representatives of CKIN, the active shippers on the Rail Line; the rail carriers with whom the Rail Line connects; the Counties through which the Rail Line traverses; the Governor of Indiana; and the Indiana Department of Transportation. In addition, a copy of the application will be deposited at any agency station through which business for the Rail Line is received or forwarded (at LaCrosse, IN).

A copy of this Notice of Intent will be published at least once per week for three consecutive weeks in newspapers of general circulation in each County through which the Rail Line traverses.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2015, I served a copy of the foregoing Petition for Waiver and Exemption in Conjunction with Prospective Application for Adverse Discontinuance of Service on the following by first-class, U.S. mail, postage prepaid:

on the Incumbent Rail Operator by serving:

John D. Heffner, Esq.  
Strasburger & Price, LLP  
1025 Connecticut Ave., N.W.  
Suite 717  
Washington, DC 20036  
also by e-mail to *john.heffner@strasburger.com*

on the Shippers on the Rail Line by serving:

Mr. John Brammeier Co-Alliance 5250 E. US Hwy 36 Building 1000 Avon, IN 46123	Kova Ag Products 6666 W. 2100 S LaCrosse, IN 46348
---	--

on the connecting rail carriers by serving:

John Scheib, Esq. General Counsel Norfolk Southern Railway Company Three Commercial Place Norfolk, VA 23510-2191	E.M. Fitzsimmons, Esq. Senior Vice President Law General Counsel and Secretary CSX Transportation, Inc. 500 Water Street Jacksonville, FL 32202
--	--

on State of Indiana officials by serving:

Honorable Mike Pence Governor, State of Indiana 200 West Washington Street, Room 206 Indianapolis, IN 46204 ( <i>by certified mail</i> );	Mr. Mike Riley Manager, Rail Office Indiana Department on Transportation 100 North Senate Avenue IGCN 955 Indianapolis, IN 46204
--	---

Indiana Utility Regulatory Commission  
PNC Center  
101 West Washington, Suite 1500E  
Indianapolis, IN 46204

on County representatives by serving:

LaPorte County Commissioners  
555 Michigan Avenue, Suite 202  
LaPorte, IN 46350

Porter County Commissioners  
155 Indiana Avenue  
Valparaiso, IN 46383

Starke County Commissioners  
53 East Mound Street  
Knox, IN 46534

on Hoosier Valley Railroad Museum by serving:

Mr. Mark Knebel  
507 Mulberry Street  
P.O. Box 75  
North Judson, IN 46563

on labor representatives by serving:

United States Railroad Retirement Board  
844 North Rush Street  
Chicago, IL 60611-2092



Thomas F. McFarland  
Thomas F. McFarland