

**STB DOCKET NO. AB-156 (Sub-No. 27X)**

---

**DELAWARE AND HUDSON RAILWAY COMPANY, INC. –  
DISCONTINUANCE OF TRackage RIGHTS EXEMPTION --  
IN NY, PA, NJ, MD, VA AND DC**

---

**JAMES RIFFIN’S MOTION TO CONSOLIDATE**

1. James Riffin herewith moves to consolidate this proceeding, AB-156 (Sub-No. 27X) with STB FD No. 35873 (Norfolk Southern’s Application to acquire 282 miles of D&H trackage in PA and NY), and in support hereof states:

2. The two proceedings are so intertwined, that they need to be consolidated. All of the conditions requested, involve the trackage rights that are the subject of AB 156 (Sub No. 27X). It is the discontinuance of the trackage rights, which causes the transaction in FD 35873, to be ‘anticompetitive.’

3. WHEREFORE, Riffin would pray that the STB consolidate AB-156 (Sub. No. 27X) with FD 35873, and for such other and further relief as would be appropriate.

Respectfully,

James Riffin  
P. O. Box 4044  
Timonium, MD 21094  
(443) 414-6210

## CERTIFICATE OF SERVICE

I hereby certify that on the 20<sup>th</sup> day of April, 2015, a copy of the foregoing Motion to Consolidate, was served on the parties noted below, by E-mail and by first class mail.

James Riffin

### E-mail:

D&H Railways:	Karl Hansen:	<a href="mailto:karl.hansen@stinsonleonard.com">karl.hansen@stinsonleonard.com</a>
D&H Railways:	David Rifkind:	<a href="mailto:david.rifkind@stinsonleonard.com">david.rifkind@stinsonleonard.com</a>