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Via E-Filing

Ms. Cynthia Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: *Sherwin Alumina Company, LLC v. Union Pacific Railroad, Co., Docket No. 42143*

Dear Ms. Brown:

On March 10, 2015, Sherwin Alumina Company, LLC ("Sherwin") filed a Petition for an Order Compelling Union Pacific Railroad Company to Provide Common Carrier Rail Service ("Petition"). Sherwin sought expedited consideration of the Petition given that UP is not currently providing any of Sherwin's needed rail service, including inbound lime deliveries, to the Sherwin plant located in Gregory, Texas.

On March 16, 2015, UP filed a letter with the Board requesting that the Board allow UP adequate time to respond to Sherwin's Petition given the size of the filing and given UP's purported need to investigate the facts. In addition, UP suggests that Sherwin's Petition is not so urgent that UP should have respond to within the 20 days allotted by the rules simply because of the amount of time that has passed since UP ceased serving Sherwin.

Sherwin objects to UP's vague proposal and its self-serving claim of a lack of urgency in this matter. UP is well aware of all of the relevant facts, as UP was actively involved in this process from the beginning. To be sure, Sherwin has not had rail service for some time, but UP misconstrues the timeline. Sherwin has been seeking to restore regular UP rail service since December 2014, but the mechanics of seeking the applicable rates, retrieving cars from storage, ordering deliveries from two quarries, and then having those cars shipped to the Gregory, Texas area was necessarily time consuming. As such, UP's refusal to deliver the ordered lime cars only

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occurred a few weeks ago. In addition, Sherwin is suffering significant additional transportation costs without UP service. Thus, Sherwin submits that UP should provide its substantive reply by March 30, 2015. *See, e.g., Canexus v. BNSF Ry., FD 35524*, slip op. at 1 (June 8, 2011) (ordering BNSF and UP to provide a substantive reply within 20 days of the filing of a service-related complaint).

Sherwin expects UP to seek a motion for an extension of time, and Sherwin will respond accordingly. Regardless, Sherwin again requests that the Board act expeditiously in this matter, and direct UP to reply promptly.

Respectfully submitted,

A handwritten signature in cursive script that reads "Daniel Jaffe". The signature is written in black ink and is positioned below the typed name.

Daniel M. Jaffe
An Attorney for Sherwin Alumina Company, LLC

cc: Michael L. Rosenthal, Esq.
Louise A. Rinn, Esq.