

**BEFORE THE SURFACE TRANSPORTATION BOARD**  
Washington, D.C.

Docket Number AB 167(SUB-NO. 1189X)

**CONSOLIDATED RAIL CORPORATION**  
**-ABANDONMENT EXEMPTION-**  
**IN HUDSON COUNTY, NJ**

**REPLY OF INTERVENORS:**  
212 Marin Boulevard, LLC  
247 Manila Avenue, LLC  
280 Erie Street, LLC  
317 Jersey Avenue, LLC  
354 Cole Street, LLC  
389 Monmouth Street, LLC  
415 Brunswick Street, LLC  
446 Newark Avenue, LLC  
NZ Funding, LLC  
Limited liability companies of New Jersey.

**TO MOTION BY**  
**CNJ RAIL FOR A PROTECTIVE ORDER**

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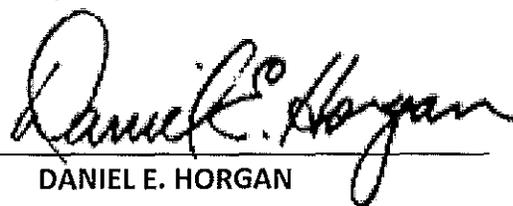
ELECTRONICALLY FILED

In response to the September 15, 2014 motion for a protective order filed by CNJ Rail, the intervener LLCs have no objection to the protection of Confidential or Highly Confidential information that may be provided to any party in these proceedings by CNJ Rail. The basis for this position is that CNJ Rail has proposed a protective order substantially in the form issued in STB Docket number AB 1095 (Sub-No. 1) in 2012. Such an order would permit any party to question the initial classification of any document and provide other protections to ensure against abuse of the restrictions imposed by a protective order. On this basis we have no objection to CNJ Rail's motion and agree with CNJ that the matter should be addressed without delay.

Respectfully submitted,

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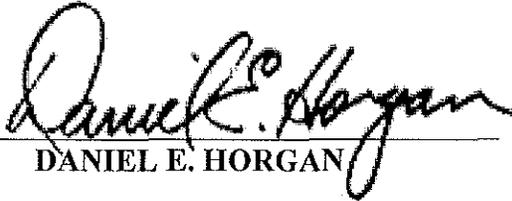
BY:   
DANIEL E. HORGAN

Dated: September 18, 2014

**CERTIFICATE OF SERVICE**

I, Daniel E. Horgan, an attorney-at-law of New Jersey, New York, and the District of Columbia, hereby certify that on September 18, 2014, I caused service of this filing with the Surface Transportation Board to be made upon the Board by Electronic Filing and that all parties on the following service list were served by First Class Mail in accordance with the provisions of 49 C.F.R. §1104.12.

**WATERS, McPHERSON, McNEILL, P.C.**

BY:   
DANIEL E. HORGAN

Dated: September 18, 2014

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