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February 10, 2014
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February 10, 2014

HUNTER FERGUSON
Direct (206) 386-7514
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VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, D.C. 20423-0001

Re: *BNSF Railway Company – Abandonment Exemption – In King County, Washington*, STB Docket No. AB-6 (Sub-No. 465X)

Ballard Terminal Railroad Company, L.L.C. – Acquisition and Operation Exemption – Woodinville Subdivision, STB Docket No. FD 35731

Dear Ms. Brown:

Attached for filing in the above-referenced proceedings is the Verified Statement of Nick Beck. Mr. Beck is the President of RJB Wholesale, Inc., a business cited by Ballard Terminal Railroad Company in its December 6, 2013 Reply as a prospective shipper on the railroad right-of-way that is the subject of these proceedings.

Very truly yours,

A handwritten signature in cursive script that reads "Hunter Ferguson".

Hunter Ferguson
Attorney for the City of Kirkland

Enclosure

cc: Counsel for all parties of record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Docket No. AB-6 (Sub-No. 465X)

**BNSF RAILWAY COMPANY – ABANDONMENT EXEMPTION – IN KING COUNTY,
WASHINGTON
(Woodinville Subdivision)**

STB Finance Docket No. 35731

**BALLARD TERMINAL RAILROAD COMPANY, L.L.C. – ACQUISITION AND
OPERATION EXEMPTION – WOODINVILLE SUBDIVISION – VERIFIED PETITION
FOR EXEMPTION PURSUANT TO 49 U.S.C. § 10502**

VERIFIED STATEMENT OF NICK BECK

I, Nick Beck, declare under penalty of perjury as follows:

1. I have personal knowledge of, and am competent to testify to, the following facts.
2. I am the President of RJB Wholesale, Inc. (“**RJB**”), which my parents formed in 1972. I have worked at RJB full-time since 1989 and became company president approximately four to five years ago.
3. RJB’s main office, warehouse, and storage and receiving yard are located at 12418 NE 124th St., Kirkland, Washington 98034, on the southeast side of the railroad right-of-way that is the subject of these proceedings (the “**Line**”). RJB has conducted business at this location since its formation. The attached map (**Exhibit 1**) shows the location of RJB’s facilities and its property boundaries outlined in red.
4. RJB supplies steel and PVC pipe, related hardware, and other construction materials such as well-drilling supplies to customers in the western United States.
5. RJB primarily receives its products in one of two ways. Materials are shipped by rail to a location south of Seattle such as Auburn or Puyallup, Washington and then carried by

truck to RJB's Kirkland yard. Or materials are shipped by vessel to the Port of Seattle or the Port of Tacoma and then carried by truck to RJB's yard. Products ordered by customers are shipped from RJB's facility via truck.

6. To my knowledge no one for RJB has ever requested rail service to or from RJB's Kirkland facility. RJB would welcome another shipping option, but the tight space in our yard and cost of building a rail spur, siding, or other rail facility necessary for service have prevented us from pursuing this option.

7. To my knowledge no one for RJB has ever requested a price quote for rail service to or from RJB's facility. Nor I am aware of any study, analysis, or investigation of the cost of rail service to or from RJB's facility.

8. There is a relatively steep embankment and ditch that run the length of the property boundaries between the Line and RJB's facility. The elevation of the rail bed is approximately 8 to 12 feet higher than the elevation of RJB's yard.

9. There is no spur track, rail siding, or other facility providing rail access to RJB's yard. In order for RJB's yard to receive rail service, a spur track, siding, or other facility would need to be built connecting RJB's yard to the Line.

10. RJB does not have a plan to construct a spur track, siding, or other rail facility, and I am not aware of any plan to construct a spur track, siding, or other facility for rail access to RJB's yard.

11. No one for RJB has performed any investigation, study, or analysis concerning the construction of a spur track, siding, or other rail facility connecting RJB's yard to the Line, and I am not aware of any such investigation, study, or analysis.

12. RJB has not made any commitment to pay for, or participate in the financing of, the construction of a spur track, siding, or other facility for rail service to its yard.

13. If RJB were able to receive rail service at its Kirkland yard, I do not know how many railcars it would receive on an annual basis.

14. At some point during the first two weeks of June 2013, Ernie Wilson of Eastside Community Rail asked me if I would sign a letter in support of Ballard Terminal Railroad's petition to reactivate rail service on the Line. Mr. Wilson presented me with an initial draft of a letter and then a revised draft based on some information provided by my staff and me. I approved the content of the revised draft, and Mr. Wilson indicated that he would sign the letter on my behalf. It is my understanding that he submitted the letter attached hereto as **Exhibit 2** to the Surface Transportation Board.

On July 1, 2013, I received an email from Barbara Sadler explaining that the Surface Transportation Board had received the letter in Exhibit 2 and that in order for the letter to appear on the Board's online docket for these proceedings I would need to notify all parties of record included on the service list attached to Ms. Sadler's email. I alerted Mr. Wilson to Mrs. Sadler's correspondence. Neither Mr. Wilson nor anyone else for Ballard Terminal Railroad or Eastside Community Rail instructed me to notify the parties of record of the letter dated June 17, 2013 filed with the Board. After further correspondence with both Ms. Sadler and Mr. Wilson, I did not notify the parties on the service list of the later dated June 17, 2013.

15. On August 8, 2013, I received another email from Mr. Wilson, explaining that the Board had denied Ballard Terminal Railroad's request for an injunction and that Ballard planned to request reconsideration on the ground that the Board failed to mention RJB. Mr. Wilson further requested that I sign another letter that he promised to draft stating that RJB would participate in the financing and construction of a rail spur into RJB's yard. A true and correct copy of Mr. Wilson's email of August 8, 2013 is attached hereto as **Exhibit 3**.

16. Again, RJB has never promised or agreed to participate in the construction or financing of a rail spur, siding, or other facility connecting its yard to the Line.

17. Mr. Wilson then presented me with multiple drafts of a supplemental letter to the Board that I requested he revise because I did not agree with some of the statements he wrote about the City of Kirkland. While I support having the availability of rail service as a shipping option, I also support Kirkland's efforts to develop its section of the Line into a trail. After Mr.

Wilson further revised this supplemental letter, I signed the last page and emailed a scanned copy of the signature page to him. A true and correct copy of this email to Mr. Wilson is attached as **Exhibit 4**. It is my understanding that the letter attached hereto as **Exhibit 5** was then submitted to the Board.

18. Mr. Wilson later informed me that my “typed name” on this letter was misspelled as “Best” instead of “Beck.” I then pointed out to Mr. Wilson that I hadn’t typed anything but, rather, just signed the signature page. A true and correct copy of this email exchange with Mr. Wilson is attached as **Exhibit 6**.



Nick Beck

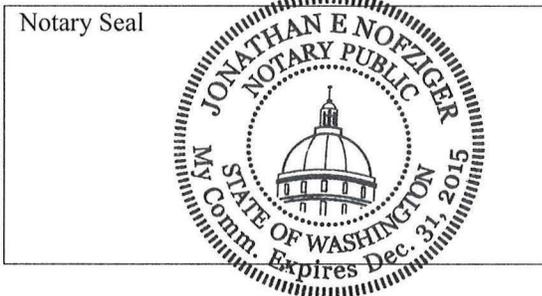
Dated: 2/5/14

Place: Kickawee

STATE OF WASHINGTON)
)ss.
COUNTY OF KING)

On this 5th day of February 2014, before me, the subscriber, a Notary Public in and for said State and County, personally appeared Nick Beck, the PRESIDENT of RJB WHOLESALC, known or identified to me to be the person whose name is subscribed to the within instrument, and in due form of law acknowledged that he/she is authorized on behalf of said company to execute all documents pertaining hereto and acknowledged to me that he/she executed the same as his/her voluntary act and deed on behalf of said company.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my seal in said State and County on the day and year last above written.



Jonathan Noefziger
(Signature of Notary)

My Commission Expires: 12/31/15

EXHIBIT 1

RJB Wholesale site



(C) 2008 King County

COMMENTS: Attachment to letter to STB supporting reactivation of Woodinville Subdivision from Woodinville to Bellevue

The information included on this map has been compiled by King County staff from a variety of sources and is subject to change without notice. King County makes no representations or warranties, express or implied, as to accuracy, completeness, timeliness, or rights to the use of such information. This document is not intended for use as a survey product. King County shall not be liable for any general, special, indirect, incidental, or consequential damages including, but not limited to, lost revenues or lost profits resulting from the use or misuse of the information contained on this map. Any sale of this map or information on this map is prohibited except by written permission of King County.

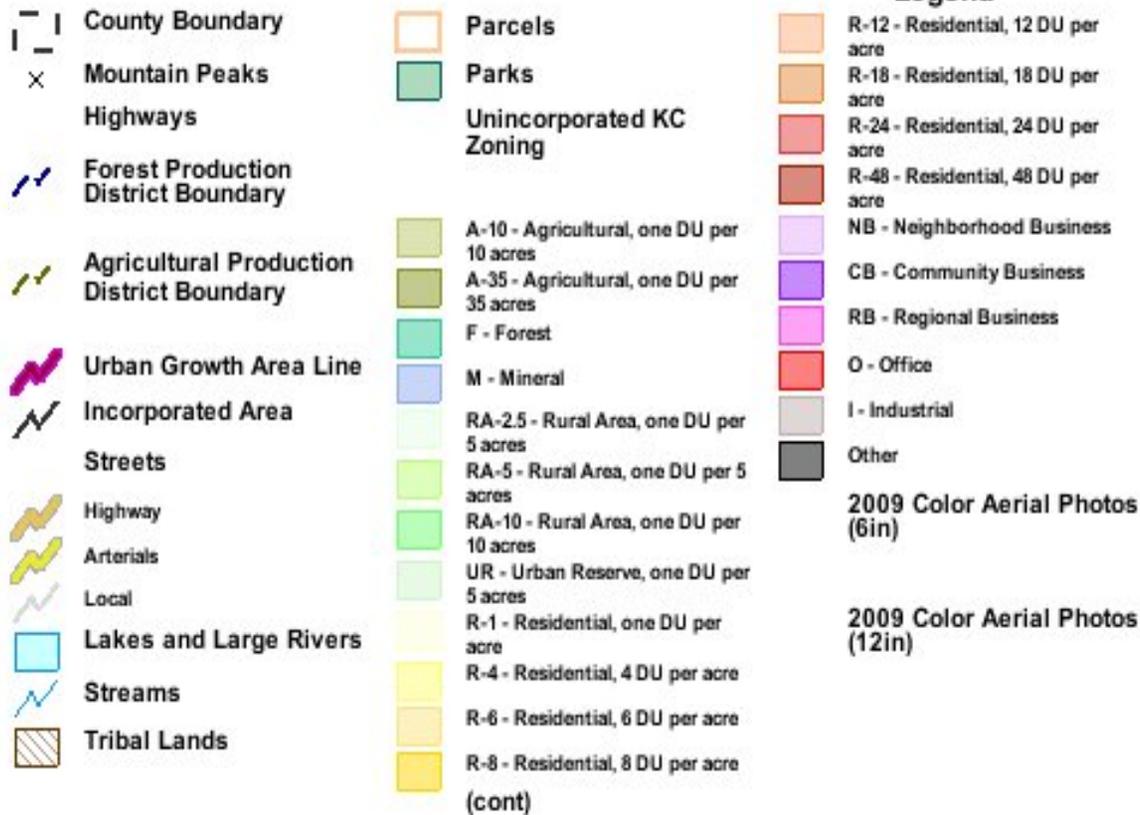
Date: 6/13/2013

Source: King County iMAP - Property Information (<http://www.metrokc.gov/GIS/iMAP>)



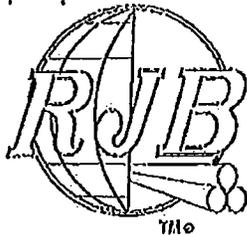
King County

RJB Wholesale site



The information included on this map has been compiled by King County staff from a variety of sources and is subject to change without notice. King County makes no representations or warranties, express or implied, as to accuracy, completeness, timeliness, or rights to the use of such information. This document is not intended for use as a survey product. King County shall not be liable for any general, special, indirect, incidental, or consequential damages including, but not limited to, lost revenues or lost profits resulting from the use or misuse of the information contained on this map. Any sale of this map or information on this map is prohibited except by written permission of King County.

EXHIBIT 2



17 June 2013

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 B Street, S.W., Room 1034
Washington, DC 20423-0001

REF: STB FINANCE DOCKET NO. 35731
BALLARD TERMINAL RAILROAD COMPANY, L.L.C.
ACQUISITION AND EXEMPTION, WOODINVILLE SUBDIVISION

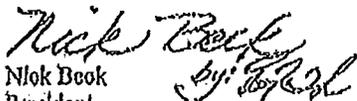
Dear Ms. Brown,

RJB Wholesale Inc., established in 1973, is the Western United States leading supplier of steel and PVC pipe to the wholesale distributor market. Our complete line of fittings meets the needs of a diverse group of industries. Additionally, RJB Wholesale supplies a full line of water well casing and drilling products. In 2012 our gross revenue exceeded \$15 million. Please refer to our Web-site at <www.RJBWholesale.com>. Our company headquarters site, including warehouses and storage yard, adjoins the southerly right-of-way line (railroad east) of BNSF Railway's former Woodinville Subdivision, just east of 124th Ave. NE, in Kirkland, Washington.

We recently became aware that Ballard Terminal Railroad is attempting to save these tracks and resume freight service on the line. So, we are writing to the Surface Transportation Board in support of Ballard's above-captioned petition to reactivate the Woodinville Subdivision between Woodinville and Bellevue, Washington. We support this reactivation because we would like to start using that rail line for receiving our product inventory, and possibly for shipping completed orders to customers. Last year we sold and distributed about 10,000 tons of pipe and other materials. Much of our bulk product is initially shipped from the manufacturer by rail, but it must currently be trans-loaded to one of our flatbed trucks in either Kent or Puyallup. Last year, we received about 26 rail cars of product. We expect 2-3 carloads per month going forward. To bring this material to our Kirkland yard, RJB trucks make over 90 trips to the trans-load sites annually, taking on average 2.5-3 hours each. Considering the constant congested traffic conditions in King County, it would save us a lot of money to be able to have those same rail cars of pipe delivered directly to our Kirkland yard. Obviously, that would make our business more competitive. It would also help us do our part towards reducing local traffic congestion and air pollution. Surely preserving and using the existing railroad infrastructure has a much higher economic return to our region than removing it and turning it into yet another expensive trail, as the City of Kirkland proposes.

We respectfully request that the STB grant Ballard's petition to reactivate this segment of rail line. We would be happy to answer any question you may have about our operations and our interest in shifting to freight delivery by rail to our facility.

Sincerely,

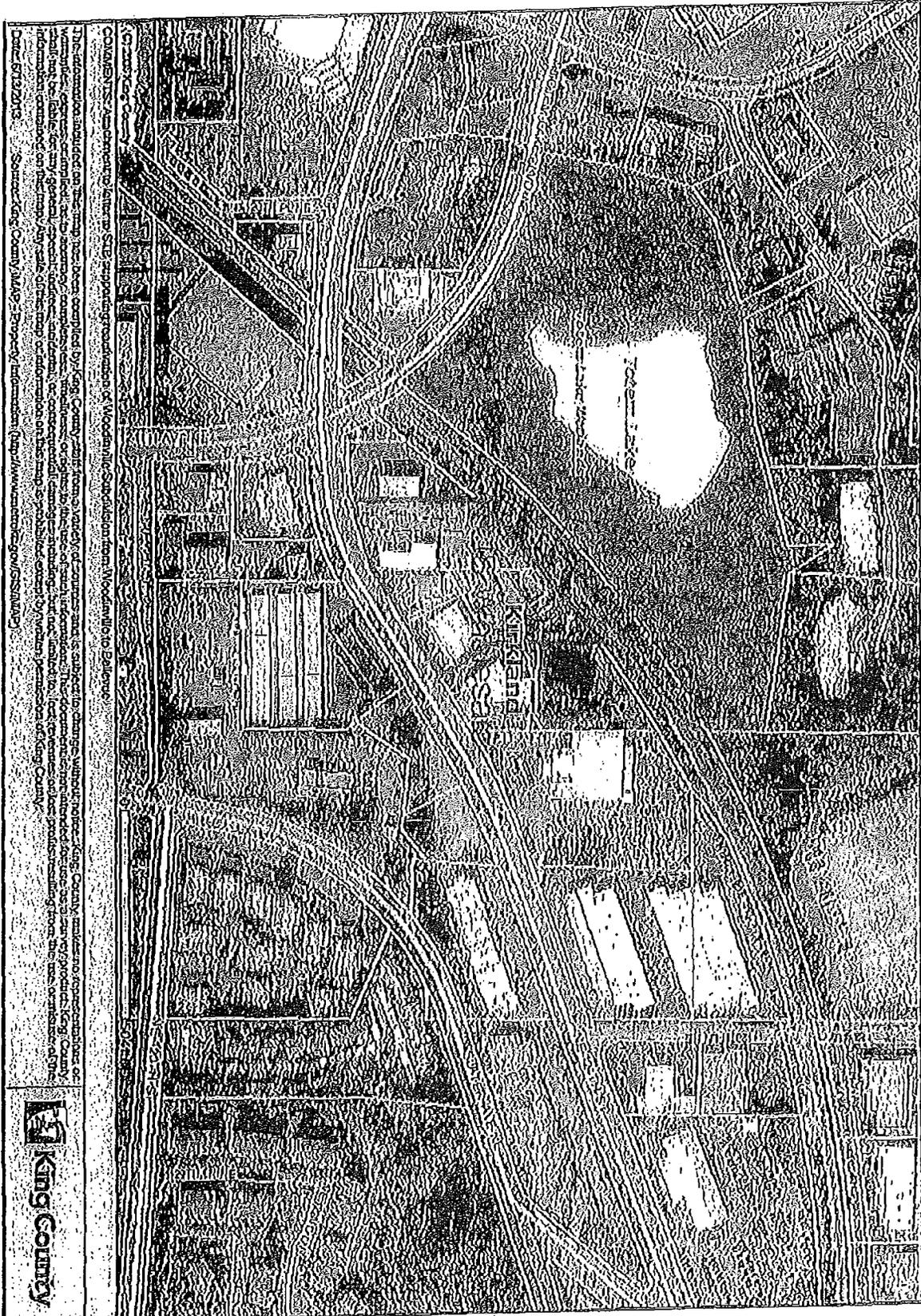

Nick Beek
President
Enclosure: Site Map, RJB Wholesale

PIPE

(252) 823-1444
FAX (252) 821-7393

P. O. BOX 2949
12410 N.E. 124TH ST.
KIRKLAND, WASHINGTON 98003

RJB Wholesale site



COMMENTS: As directed to enter the STIP support of roadwork of Woodmanville subdivision from Woodmanville to Palmetto.

This information included on this map has been compiled by King County staff from a variety of sources and is subject to change without notice. King County makes no representation or warranty, express or implied, as to accuracy, completeness, timeliness, or reliance on the use of such information. It is recommended that users verify product information with the appropriate authority. No responsibility is assumed for any errors, omissions, or damages, including consequential damages, arising from the use of this information. Information contained on this map is provided for informational purposes only and does not constitute an offer of insurance or any other financial product. For more information, please contact the Department of Information Systems at (206) 462-3000 or visit our website at www.kingcounty.gov/IS&IT.

Date: 07/12/2015



EXHIBIT 3

From: ewilson@spiretech.com
Sent: Thursday, August 08, 2013 5:48 PM
To: Nick Beck
Cc: doug.engle@escrail.org
Subject: Railroad reactivation through Kirkland

Importance: High

Hi Nick-

I understand you are out of town this week, but I need to inform you of the latest developments in the rail battle.

We had a setback last week when the STB declined to issue an injunction to keep Kirkland from removing the tracks through town, without deciding the reactivation petition. However, there is provision to request 'reconsideration', and that is what we are doing. One of the grounds for that is in the event of material error by the Board. We think the fact that they failed to mention your company and potential rail service to you is such an error.

So we need to send another letter to STB. Based on what the STB said in this decision, we need to make sure they know that, while you don't have a rail spur into your property now, you want one and fully expect to participate in financing its construction. I can put together the letter, including whatever points you would like to make, but it would be helpful to talk with you first. Any chance you could call me tomorrow? We are trying to get letters in ASAP, because we expect Kirkland's contractor to start removing the tracks as soon as next week.

Thanks.

Ernie

H 425-869-8899 M 509-430-9350

EXHIBIT 4

From: Nick Beck <nick@rjbwholesale.com>
Sent: Tuesday, August 20, 2013 10:19 PM
To: ewilson@spiretech.com; Ernest F. Wilson <ernie.wilson@EsCRail.org>
Subject: Fwd:
Attachments: 20130820143450452.pdf; ATT00001.htm

Sent from my iPad

Begin forwarded message:

From: <mfp@rjbwholesale.com>
Date: August 20, 2013, 2:34:50 PM PDT
To: Nick Beck <nick@rjbwholesale.com>

This E-mail was sent from "RICOHMP161" (Aficio MP 161).

Scan Date: 08.20.2013 14:34:50 (-0700)
Queries to: mfp@rjbwholesale.com

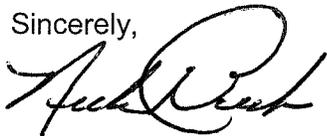
low interest rates and negligible inflation of construction costs, this appears unlikely, too. Besides, people are already walking along the tracks today. And trails co-exist with trains in freight rail corridors in many locales. We don't see any real harm to the City from a slight delay in your overall decision regarding reactivation vs. track removal. On the contrary, we see real harm to local industry's freight mobility from the threatened loss of rail service, which Kirkland falsely claims isn't feasible.

The potential 'harm' to King County and Sound Transit is even harder to quantify. Nothing in Ballard's reactivation proposal would substantially interfere with those agencies' plans. Ballard has made clear that they support 'Rails with Trails', and so do we. Consider also that an intact Woodinville Subdivision rail line offers the possibility of future (circa 2023) commuter trains feeding customers to Sound Transit in Bellevue. What is the real harm to other interested parties? We submit that there isn't any. Where is the proof of the parties' claim, restated by the Board, that they have "invested years and millions of dollars of public funding toward their interim trail use and other public projects in the area the Line traverses"? King County only consummated their purchase of a portion of the Line's right-of-way this year. They still have not completely paid for it, and don't expect to for a few years. King County also doesn't yet have a Master Plan or trail design for their part of the corridor. We submit that the Board erred in giving credence to their arguments.

We appreciate that a case such as this presents the Board with many competing interests and arguments. However, it appears to us that Ballard's request for authority to reinstate freight rail service on this Line and expand its service territory is sound, and comes from a bona fide and solvent rail operator. Considering the extreme financial barrier to entry that would be posed by prior removal of the rail assets, it is vital for the STB to protect them during these proceedings. Shouldn't that be the Board's default position on these matters? For the reasons stated herein, we therefore respectfully request that the STB grant this petition for reconsideration of its August 1st decision in this matter, and immediately enjoin Kirkland from instituting any further salvage operations on or along the Line, pending the Board's final action on Ballard's Acquisition and Operation Exemption request.

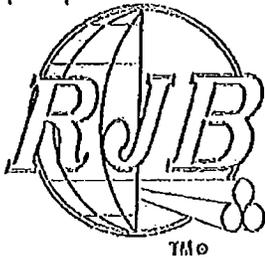
Thank you for your consideration of our petition and of our interest in obtaining freight rail service from Ballard Terminal Railroad into our trackside facility in Kirkland.

Sincerely,



Nick Best
President

EXHIBIT 5



20 August 2013

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW, Room 1034
Washington, DC 20423-0001

PETITION FOR RECONSIDERATION

**REF: STB FINANCE DOCKET NO. 36731/ Docket No. AB 6(Sub-No. 485X)
BALLARD TERMINAL RAILROAD COMPANY, L.L.C.
ACQUISITION AND EXEMPTION, WOODINVILLE SUBDIVISION**

Dear Ms. Brown,

RJB Wholesale, Inc.(RJB), hereby notifies the Board that we are petitioning for reconsideration of the Board's decision of 7 August denying Ballard Terminal Railroad Company's (Ballard) request for an injunction to prevent the City of Kirkland, Wash., from salvaging 6.75 miles of track over which Ballard is seeking authority to reinstitute freight rail service. We allege that the Board erred in not considering the impact on RJB of removing the rails which adjoin our facility, when we have previously stated to STB our interest in obtaining freight rail service from Ballard over these very tracks. It is inconceivable to us that the Board would even consider allowing the rails to be removed by Kirkland prior to the Board's full consideration of the reactivation request and circumstances. We further allege that it was error for the Board to partially base its decision on Kirkland's unsubstantiated claims of possible harm from further delay of the decision on the requested injunction. Contrary to the Board's conclusion, we believe that Ballard has in fact demonstrated adequate support for delaying a ruling on its preliminary injunction request, or alternatively, granting the injunction immediately.

In June, we wrote to the Board in support of Ballard's proposed rail line reactivation and expressed our interest in receiving our product inventory by rail. The Board in its decision failed to mention us as a 'prospective shipper', even though our business is located on the Line and is a 'conventional' rail customer. Our current product volume exceeds 10,000 tons/year. As we pointed out, most of our pipe already ships from factories by rail, requiring additional cost to transload to our trucks for delivery to our distribution yard. So, the Board is in error in stating (on P. 6) that the record fails to show that there actually are "...customers 'ready willing and able' to use freight rail service". We are such a customer, in an industrial zone, yet Kirkland never inquired about our potential use of the adjacent rails. While we may not have a rail spur into our facility today, we are quite ready and financially able to participate in the cost of such an improvement to our facility. In fact, we would welcome that opportunity to upgrade our distribution operations with rail shipping.

Regarding Kirkland's claim of financial and other harms that would befall it if they were required to wait to begin salvage operations, it seems questionable to us. Kirkland is located in an area of the Pacific Northwest with a temperate, marine climate. We are a construction-related business. Low technology construction activity, such as rail salvage, can be conducted virtually year-round here. Considering that the City went through a public bidding process to select a salvage contractor, we are quite sure that the chosen firm would gladly extend their offer a few months in order to hold on to the rail removal contract, which would be quite lucrative to them. The Board also repeats Kirkland's claim that a "delay in proceeding with these plans will result in costs to the City's taxpayers..." In today's climate of extremely

RJB Petition to Reconsider
STB Dockets PD 35731 & AB 6 (Sub-No. 465X)
P. 2

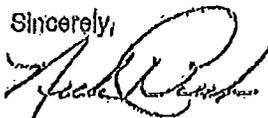
low interest rates and negligible inflation of construction costs, this appears unlikely, too. Besides, people are already walking along the tracks today. And trails co-exist with trains in freight rail corridors in many locales. We don't see any real harm to the City from a slight delay in your overall decision regarding reactivation vs. track removal. On the contrary, we see real harm to local industry's freight mobility from the threatened loss of rail service, which Kirkland falsely claims isn't feasible.

The potential 'harm' to King County and Sound Transit is even harder to quantify. Nothing in Ballard's reactivation proposal would substantially interfere with those agencies' plans. Ballard has made clear that they support 'Rails with Trails', and so do we. Consider also that an intact Woodinville Subdivision rail line offers the possibility of future (circa 2023) commuter trains feeding customers to Sound Transit in Bellevue. What is the real harm to other interested parties? We submit that there isn't any. Where is the proof of the parties' claim, restated by the Board, that they have "invested years and millions of dollars of public funding toward their interim trail use and other public projects in the area the Line traverses"? King County only consummated their purchase of a portion of the Line's right-of-way this year. They still have not completely paid for it, and don't expect to for a few years. King County also doesn't yet have a Master Plan or trail design for their part of the corridor. We submit that the Board erred in giving credence to their arguments.

We appreciate that a case such as this presents the Board with many compelling interests and arguments. However, it appears to us that Ballard's request for authority to reinstate freight rail service on this Line and expand its service territory is sound, and comes from a bona fide and solvent rail operator. Considering the extreme financial barrier to entry that would be posed by prior removal of the rail assets, it is vital for the STB to protect them during these proceedings. Shouldn't that be the Board's default position on these matters? For the reasons stated herein, we therefore respectfully request that the STB grant this petition for reconsideration of its August 1st decision in this matter, and immediately enjoin Kirkland from instituting any further salvage operations on or along the Line, pending the Board's final action on Ballard's Acquisition and Operation Exemption request.

Thank you for your consideration of our petition and of our interest in obtaining freight rail service from Ballard Terminal Railroad into our trackside facility in Kirkland.

Sincerely,



Nick Best
President

EXHIBIT 6

From: Nick Beck <nick@rjbwholesale.com>
Sent: Wednesday, August 21, 2013 2:57 PM
To: ewilson@spiretech.com
Subject: RE: #2 Re: FW:

I typed? I don't recall typing anything I just signed it

-----Original Message-----

From: ewilson@spiretech.com [<mailto:ewilson@spiretech.com>]
Sent: Wednesday, August 21, 2013 2:48 PM
To: Nick Beck
Subject: #2 Re: FW:
Importance: High

Nick-

I just realized that your typed name on the letter is 'Best', instead of Beck. I don't know how that got by us, but I apologize for the error.

Maybe you could fix that before printing out our file copy.

Ernie

>

>

> -----Original Message-----

> From: mfp@rjbwholesale.com [<mailto:mfp@rjbwholesale.com>]
> Sent: Wednesday, August 21, 2013 10:16 AM
> To: Nick Beck
> Subject:

>

> This E-mail was sent from "RICOHMP161" (Aficio MP 161).

>

> Scan Date: 08.21.2013 10:16:07 (-0700) Queries to:

> mfp@rjbwholesale.com

>

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Docket No. AB-6 (Sub-No. 465X)

**BNSF RAILWAY COMPANY – ABANDONMENT EXEMPTION – IN KING COUNTY,
WASHINGTON
(Woodinville Subdivision)**

STB Finance Docket No. 35731

**BALLARD TERMINAL RAILROAD COMPANY, L.L.C. – ACQUISITION AND
OPERATION EXEMPTION – WOODINVILLE SUBDIVISION – VERIFIED PETITION
FOR EXEMPTION PURSUANT TO 49 U.S.C. § 10502**

CERTIFICATE OF SERVICE

Matthew Cohen
Hunter Ferguson
STOEL RIVES LLP
600 University Street, Suite 3600
Seattle, WA 98101
(206) 386-7569
mcohen@stoel.com
hoferguson@stoel.com

Counsel for the City of Kirkland, Washington

Dated: February 10, 2014

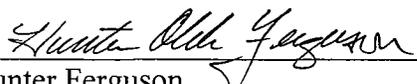
CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of 1) Letter from Hunter Ferguson to the Surface Transportation Board, 2) Verified Statement of Nick Beck, and 3) Certificate of Service upon the following parties by first class mail with postage prepaid and properly addressed:

Jordan Wagner Jennifer Belk Central Puget Sound Regional Transit Authority 401 S. Jackson Street Seattle, WA 98104 <i>Attorneys for Central Puget Sound Regional Transit Authority</i>	Service by: <input type="checkbox"/> hand delivery via messenger <input checked="" type="checkbox"/> mailing with postage prepaid <input checked="" type="checkbox"/> copy via email <input type="checkbox"/> facsimile
Myles L. Tobin, Esq. Thomas J. Litwiler Thomas C. Paschalis Fletcher & Sippel LLC 29 North Wacker Drive Suite 920 Chicago, IL 60606-2832 <i>Attorneys for Ballard Terminal Railway LLC</i>	Service by: <input type="checkbox"/> hand delivery via messenger <input checked="" type="checkbox"/> mailing with postage prepaid <input checked="" type="checkbox"/> copy via email <input type="checkbox"/> facsimile
Tom Montgomery Montgomery Scarp PLLC 1218 3rd Ave # 2700 Seattle, WA 98101 <i>Attorneys for Ballard Terminal Railway LLC</i>	Service by: <input type="checkbox"/> hand delivery via messenger <input checked="" type="checkbox"/> mailing with postage prepaid <input checked="" type="checkbox"/> copy via email <input type="checkbox"/> facsimile
Pete Ramels Andrew Marcuse Office of the Prosecuting Attorney—Civil Division W400 King County Courthouse 516 Third Avenue Seattle, WA 98104 <i>Attorneys for King County</i>	Service by: <input type="checkbox"/> hand delivery via messenger <input checked="" type="checkbox"/> mailing with postage prepaid <input checked="" type="checkbox"/> copy via email <input type="checkbox"/> facsimile

Charles A. Spitulnik
W. Eric Pilsk
Allison Fultz
Kaplan Kirsch & Rockwell LLP
1001 Connecticut Avenue, NW, Suite 800
Washington, DC 20036
Attorneys for King County

Service by:
 hand delivery via messenger
 mailing with postage prepaid
 copy via email
 facsimile



Hunter Ferguson

Dated this 10th day of February, 2014.