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BEFORE THE
SURFACE TRANSPORTATION BOARD



STB DOCKET NO. AB-167 (Sub- No. 1190X)

CONSOLIDATED RAIL CORPORATION – ABANDONMENT EXEMPTION –
IN HUDSON COUNTY, NJ

MOTION FOR LEAVE TO REPLY TO CONRAIL'S NEW ISSUES

1. Now come Eric Strohmeyer, a non-carrier, and James Riffin, a carrier ("Offerors"), who herewith file this Motion for Leave to Reply to Conrail's New Issues in the above entitled proceeding.

2. On September 11, 2009, Conrail filed its Reply to the Offerors' Answer to Show Cause Order. In its reply, Conrail raised a number of new issues. The Offerors would ask for permission to reply to these new issues, so that the Board will have a more complete record before it.

3. WHEREFORE, the Offerors herewith request permission to file the Reply to Conrail's New Issues that is contained in the Reply to NJT 9/19/09 Pleading, which was filed concurrently with this pleading.

Executed on: September 30, 2009

Respectfully submitted,


Eric S. Strohmeyer


James Riffin

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of October, 2009, a copy of the foregoing Motion for Leave to Reply to Conrail's New Issues was mailed via first class mail, postage prepaid, to the parties of record in this proceeding (Conrail, NJT).


James Riffin