



CNJ Rail Corporation

81 Century Lane * Watchung, NJ, 07069

Phone: (908) 361 – 2435 Email: CNJRail@Yahoo.com

April 2, 2010

The Honorable Cynthia T. Brown
Chief - Section of Administration
Surface Transportation Board
395 E Street SW, Room 100
Washington, D C 20024

Re: STB Docket AB 290 (Sub 311) X,

Norfolk Southern Railway Company

Petition for Exemption
Abandonment of Rail Freight Service
In Baltimore City and Baltimore County, MD

Dear Ms. Brown,

Please find transmitted herewith a *Motion for a protective order*, *Notice of intent to file an OFA*, and a *Request to toll the time period for filing an OFA*, in the above captioned proceeding which I am filing on my own behalf. If you have any questions or concerns, please contact the undersigned.

In addition, as soon as three other pleadings can be reproduced and served this evening, it is expected that the additional pleadings will be submitted to the Board via E-Filing over the weekend. They will include a *Motion to late-file a protest*, a *Formal protest of the abandonment*, and a *Request for a hearing* should the Board permit the OFA process to move forward.

Respectfully submitted,

Eric S. Strohmeyer /s/

Eric S. Strohmeyer
Vice President, COO
CNJ Rail Corporation
(908) 361 – 2435 (direct line)

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB DOCKET NO. AB-290 (Sub- No. 311X)

NORFOLK SOUTHERN RAILWAY COMPANY

- PETITION FOR EXEMPTION -
- ABANDONMENT OF RAIL FREIGHT SERVICE -
- IN BALTIMORE CITY AND BALTIMORE COUNTY, MD -

MOTION FOR A PROTECTIVE ORDER PURSUANT TO 49 CFR 1104.14

I, Eric S. Strohmeyer, whose address is 81 Century Lane, Watchung, NJ 07069, herewith, pursuant to 49 CFR 1104.14, request that the Board issue a protective order allowing me to make available to the Board, under seal, certain confidential and / or highly confidential documents and information in connection with my Offer of Financial Assistance (“OFA”) in the above captioned case, which I, jointly with James Riffin, Carl Delmont, Zandra Rudo and Lois Lowe, will be filing at a later date. Such highly confidential documents include my personal financial statement, which I do not want published in the public docket. Accordingly, I request that the Board adopt the form of protective order contained in the Board’s January 29, 2010 Decision.

Prior to submitting this information under seal, I respectfully request the Board put in place the protective order in a similar manner to the Board's decision in *STB FD 35297 New Jersey Seashore Lines - Operations Exemption - Clayton Companies, Inc.* served on October 14, 2009.

I, the undersigned, declare under the penalty of perjury that the information contained in the foregoing Motion for Protective Order, is true and correct to the best of my knowledge, information and belief. Further, I certify that I am qualified and authorized to file this Motion.

Respectfully submitted,

Eric S. Strohmeyer /s/

Eric Strohmeyer

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2010, a copy of the foregoing Motion for Protective Order, was served by first class mail, postage prepaid, upon James R. Paschall, Senior General Attorney, Norfolk Southern Corporation, Law Department, Three Commercial Place, Norfolk, VA 23510-9241, and upon Charles A. Spitulnik, STE 800, 1001 Connecticut Avenue, NW, Washington, DC 20036, counsel for the MTA.

Eric S. Strohmeyer /s/

Eric S. Strohmeyer