

STB

FD

32760

(SUB 35)

10-8-99

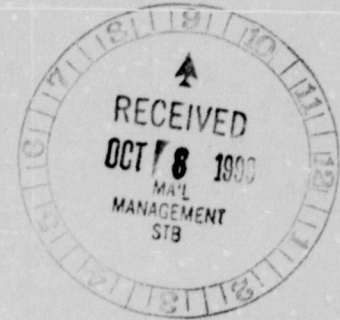
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STB FD-32760 (Sub 35) 10-8-99 J

KATHLEEN SULLIVAN
1110 Bayswater Avenue, #302
Burlingame, CA 94010
(650) 340-8249

October 7, 1999



VIA FAX
Original sent via US Mail

Surface Transportation Board
1925 K Street, NW, Room 715
Washington, D.C. 20423

32760 Sub 35

Re: Request for an Extension to file an Appeal for Review of Arbitration Award Pursuant to Article 1, §10 of Finance Docket No. 32760, In the Matter of the Arbitration between: Kathleen V. Sullivan, Claimant, and Union Pacific Railroad Company, Carrier.

I would like to request an extension to file an appeal in the above-referenced Arbitration. The decisions were rendered on May 21, 1999 and a subsequent decision, after an executive session, rendered on September 17, 1999 by Arbitrator John La Rocco.

The Arbitration Committee met in executive session on September 7, 1999. In that session I was able to rebuttal all the points that I did not agree with in the Arbitrator's award issued on May 21, 1999. The Arbitrator after reviewing pertinent parts of the record and reconsidering the proposed decision, concluded that the proposed decision was correct and is now the final decision of the Committee. I do not agree with his decision and I feel I clearly proved my case.

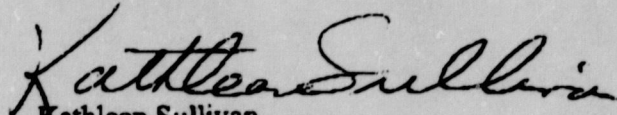
I'm appealing under Article 1, § 10 of the New York Dock Conditions and other erroneous conclusions and misrepresentations of facts that I feel the Arbitrator's denial was based on.

During the executive session Mr. LaRocco said that he did not think it was good business to reverse decisions and out of 3,000 decisions rendered he had only reversed one. He also advised me that I could appeal to the Surface Transportation Board but I told him that I did not have the financial means to pursue this any further and basically put it behind me.

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Subsequently, in the last few days, a friend with years of New York Dock experience has offered to help with the appeal. I called the STB on Monday, October 4, 1999 to inquire if there were time lines and I was told that I had until Thursday, October 7, 1999 to file. My friend was not available to help me this week so accordingly I am requesting an extension of 60 days to file an appeal.

Respectfully,


Kathleen Sullivan

cc: Mr. Richard Meredith
Manager, Labor Relations
Union Pacific Railroad Company
1416 Dodge Street
Omaha, NE 68179

John A. Vuono
 William A. Gray
 Mark D. Vuono*
 Dennis J. Kusturiss
 Christine M. Dolfi
 Louise R. Schrage
 *Also Admitted in Florida

Law Offices of
VUONO & GRAY, L.L.C
 2310 Grant Building
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Richard R. Wilson
of Counsel

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September 28, 1999

Thomas F. McFarland, Jr.
 McFarland & Herman
 20 North Wacker Drive, Suite 1330
 Chicago, IL 60606-2902

Re: **STB Docket No: AB 556 (Sub No 2X) - Railroad Ventures, Inc.**
*Abandonment and Discontinuance - Rail Line Between Youngstown, OH
 and Darlington, PA in Mahoning and Columbiana Counties, OH and
 Beaver County, PA, and*

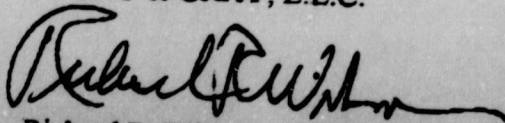
**STB Docket No: AB 555 (Sub No 2X) - The Ohio & Pennsylvania
 Railroad Company - Adverse Discontinuance of Service Exemption -
 Between Youngstown, OH and Darlington, PA in Mahoning and
 Columbiana Counties, OH and Beaver County, PA**

Dear Mr. McFarland:

We are in receipt of your letter of September 24, 1999 regarding your request for a copy of the purchase offer for the 4.2 miles of right of way in Mahoning County. In the absence of an OFA purchase, that portion of the right of way will be acquired for recreational trail purposes as previously noted by Boardman Township. You already have a copy of the appraisal which has been prepared in connection with that proposed acquisition. I have requested that RVI obtain a written confirmation of the purchase offer from Boardman Township and I will provide it to you as soon as it is available.

Very truly yours,

VUONO & GRAY, L.L.C.



Richard R. Wilson

RRW/klh

xc: All Parties of Record
 Secretary, Surface Transportation Board