

- O.James Frank Abbott
- President and CEO
- Community Oversight Partner Services
- 1006 Grand Boulevard, Apartment 511
- Kansas City, MO 64106

300015

ENTERED
Office of Proceedings
November 21, 2019
Part of
Public Record

- November 21,, 2019

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

- Re: Union Pacific Railroad Company and Jackson County, Missouri -Abandonment Exemption - STB Docket AB 33 (Sub No. 342X)

- Jackson County Missouri purchased right of way associated with 17.7 miles comprising a rail property for fair market value from Union Pacific Railroad Company in 2016. Union Pacific Railroad now alleges that it is the owner of the rail property previously purchased by the county. Union Pacific Railroad is not eligible to enter into negotiations with the County for interim trial use and railroad banking for this rail property in the opinion of James Frank Abbott, Founder and CEO, Community Oversight Partner Services.

- [https://www.stb.gov/filings/all.nsf/ba7f93537688b8e5852573210004b318/2dff477203e9370a852584b700594e0a/\\$FILE/249005.pdf](https://www.stb.gov/filings/all.nsf/ba7f93537688b8e5852573210004b318/2dff477203e9370a852584b700594e0a/$FILE/249005.pdf)

- Respectfully submitted,

- Electronically Signed
- James Frank Abbott

- Certificate of Service
- I certify that on November 21, 2019, a true copy of the foregoing letter was served via email upon the following parties of record:
- Brown, Sandra L.
- Thompson Hine LLP
- 1919 M Street, Suite 700
- Washington, DC 20036
- Sandra.brown@thompsonhine.com
- McCulley, Elizabeth A.
- 2100 Central
- Suite 22p
- Kansas City, MO 64108
- mcculley@swm.legal
- Jeremy Berman
- Union Pacific Railroad Company
- 1400 Douglas Street
- Mail.Stop.1690
- Omaha, NB 68179-1690
- jberman@up.com
- Kevin Sheys
- Hogan Lovells US LLP
- Columbia Square
- 555 Thirteenth Street NW
- Washington DC 20004
- kevin.sheys@hoganlovells.com
- Ed Fishman
- Hogan Lovells US LLP
- Columbia Square
- 555 Thirteenth Street NW
- Washington DC 20004
- ed.fishman@hoganlovells.com
- Carolyn Gaut Kraska
- Hogan Lovells US LLP
- Columbia Square
- 555 Thirteenth Street NW
- Washington DC 20004
- caro1yn.kraska@hoganlovells.com
- Covinsky, Bryan
- Interim County Counselor
- Jackson County Missouri
- 415 E 12th Street
- Kansas City, MO 64107
- bcovinsky@jacksongov.org