

BEFORE THE
SURFACE TRANSPORTATION BOARD

ENTERED
Office of Proceedings
April 20, 2020
Part of
Public Record

DOCKET NO. AB-1296X
R. J. CORMAN RAILROAD PROPERTY, LLC –ABANDONMENT
EXEMPTION – IN SCOTT, CAMPBELL, AND ANDERSON
COUNTIES, TENNESSEE

MOTION TO EXTENSION OF TIME TO
FILE OFFER OF FINANCIAL ASSISTANCE

ARKANSAS-OKLAHOMA RAILROAD, CO.
116 W. Main St.
Wilburton, OK 74578

Offeror

DANIEL A. LaKEMPER
General Counsel
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P.O. Box 185
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Attorney for Offeror

Date: April 17, 2020

BEFORE THE
SURFACE TRANSPORTATION BOARD

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ARKANSAS-OKLAHOMA RAILROAD, CO. (“AOK”) hereby respectfully moves for an extension of time to file an Offer of Financial Assistance (“OFA”) to purchase the rail line proposed for abandonment, and in support thereof, states as follows:

Due to the unprecedented state of emergency created by the coronavirus threat and “lockdown” situation, AOK’s inspectors and appraisers have been unable to access the line to perform those tasks. AOK is ready, willing and able to do so as soon as restrictions have been lifted, and it is safe to travel.

AOK has been in frequent communications with the Applicant, R. J. Corman Railroad (“Corman”) during the past few weeks. Corman has been

responsive to AOK's communications, and AOK has received some of the necessary information concerning the assets comprising the line, but has yet to receive any information regarding the real estate, or detailed information regarding Corman's calculations of net asset value.

This Motion is being filed in good faith, and for the reasons stated. AOK asks that the Board, like many other courts and government agencies, recognize the extreme difficulties posed by the current situation, and grant appropriate relief.

WHEREFORE, AOK respectfully requests that the deadline for filing an OFA in this matter be extended for a reasonable time after the current "state of emergency" is lifted; that the Board provide guidance to Corman regarding the production of information regarding the assets; and for such other relief as the Board deems appropriate.

Respectfully submitted,
ARKANSAS-OKLAHOMA RAILROAD CO.

/s/ Daniel A. LaKemper

DANIEL A. LaKEMPER
P.O. Box 185
Morton, Illinois 61550
lakemper@mtco.com

Dated: April 17, 2020

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2020, I served the foregoing document, Motion for Extension of Time to File an Offer of Financial Assistance on Catherine S. Wright at cwright@irvinrigsby.com, attorney for R. J. Corman Railroad Property, LLC. and Robert Weber at weber9985@att.net, on behalf of the Cumberland Trails Conference.

/s/ Daniel A. LaKemper

DANIEL A. LaKEMPER

SUPPLEMENTAL CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2020, I served the foregoing document, Motion for Extension of Time to File an Offer of Financial Assistance on Mark Bevilhimer at bigelowt2@mindspring.com, on behalf of Tennessee Citizens for Wilderness Planning.

/s/ Daniel A. LaKemper

DANIEL A. LaKEMPER