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October 8, 2020
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Via E-File

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

RE: Notice of Withdrawal and Substitution of Counsel

Dear Ms. Brown:

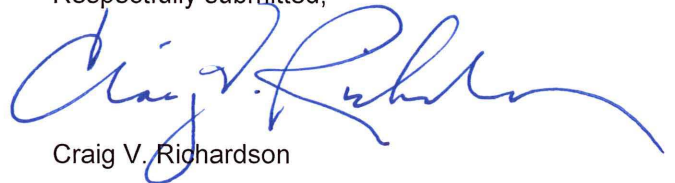
I am writing on behalf of Union Pacific Railroad Company to notify you and the Surface Transportation Board (collectively referred to as the "Board"), as well as all relevant Parties of Record, that Rhonda S. Ferguson has withdrawn from serving as Union Pacific counsel effective September 30, 2020. Please substitute Craig V. Richardson, Interim Executive Vice President and Chief Legal Officer, for Rhonda S. Ferguson in any pending Board matter. The Board may need to make this change in the following dockets:

EP 328 (Sub No. 2) *Investigation of Tank Car Allowance System*
EP 431 (Sub No. 4), *Review of the General Purpose Costing System*
EP 661 (Sub No. 2), *Rail Fuel Surcharges (Safe Harbor)*
EP 665 (Sub No. 2), *Expanding Access to Rate Relief*
EP 704 (Sub No. 1), *Review of Commodity, Boxcar, and TOFC/COFC Exemptions*
EP 711 (Sub No. 1), *Reciprocal Switching*
EP 722 *Railroad Revenue Adequacy*
EP 733 *Expediting Rate Cases*
EP 754 *Oversight Hearing on Demurrage and Accessorial Charges*
EP 755 *Final Offer Rate Review*
EP 756 *Market Dominance Streamlined Approach*
EP 757 *Policy Statement on Demurrage and Accessorial Rules and Charges*
EP 759 *Demurrage Billing Requirements*
EP 761 *Hearing on Revenue Adequacy*
EP 765 *Joint Petition for Rulemaking to Establish a Voluntary Arbitration Program for Small Rate Disputes*
EP 766 *Joint Petition for Rulemaking to Modernize Annual Revenue Adequacy Determinations*
FD 32760 *Union Pacific Corporation, Union Pacific Railroad Company, and Missouri Pacific Railroad Company--Control and Merger--Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp., and the Denver and Rio Grande Western Railroad Company, and any active sub-dockets, including EP 32760_46*

FD 36186 *Texas Railway Exchange LLC—Construction and Operation Exemption—Galveston County, Tex.*
FD 36186_1 *Petition of Texas Railway Exchange LLC for Issuance of a Crossing Order*
FD 36197 *Union Pacific Railroad – Petition for Declaratory Order and Preliminary Injunction*
FD 36386 *KCVN, LLC and Colorado Pacific Railroad, LLC – Feeder Line Application – Line of Union Pacific Railroad Co. Located in Pueblo, Fremont, Chaffee, Lake and Eagle Counties*
FD 36396 *Tri-City Railroad Company, LLC -- Petition for Modification of Trackage Rights Agreement – Port of Benton County, WA, BNSF Railway Company, and Union Pacific Railroad Company*
FD 36408 *Leroy Haynes – Petition for Declaratory Order*
FD 36420 *Commuter Rail Division of the Regional Transportation Authority d/b/a Metra—Verified Petition for Declaratory Order and Verified Petition for Preliminary Injunction*
NOR 38302S *United States Department of Energy and United States Department of Defense v. Baltimore & Ohio Railroad Company, et al.*
NOR 38376S *United States Department of Energy and United States Department of Defense v. Aberdeen & Rockfish Railroad Company, et al.*
NOR 42144 *North America Freight Car Association; American Fuel & Petrochemicals Manufacturers; The Chlorine Institute; The Fertilizer Institute; American Chemistry Council; Ethanol Products, LLC d/b/a Poet Ethanol Products; Poet Nutrition, Inc.; and Cargill Incorporated v. Union Pacific Railroad Co.*
NOR 42150 *Valero Marketing and Supply Company and Valero Rail Partners, LLC v. Union Pacific Railroad Company*
NOR 42152 *Tesoro Refining & Marketing Company LLC; Tesoro Great Plains Gathering & Marketing, LLC; and Dakota Prairie Refining, LLC v. Union Pacific Railroad Co.*
NOR 42153 *Arkema Inc. v. Union Pacific Railroad Company*
NOR 42164 *Olin v. Union Pacific Railroad Company*
NOR 42165 *Hasa, Inc. v. Union Pacific Railroad Company*

Union Pacific intends to make this counsel substitution in all pending Board proceedings. If a pending Board proceeding in which Rhonda S. Ferguson is serving as counsel has been omitted, then Union Pacific respectfully requests this counsel substitution also be made in that proceeding.

Respectfully submitted,



Craig V. Richardson

cc: Rhonda S. Ferguson
Michael L. Rosenthal
Raymond Atkins