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April 25, 2023
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BEFORE THE
SURFACE TRANSPORTATION BOARD

STB DOCKET NO. AB 1328X

CITY OF TACOMA, DEPARTMENT OF PUBLIC WORKS D/B/A TACOMA
RAIL MOUNTAIN DIVISION
--DISCONTINUANCE OF SERVICE EXEMPTION--
IN PIERCE COUNTY, WASHINGTON

**OBJECTION TO PETITION FOR SURREBUTTAL BY CITY OF TACOMA
DEPARTMENT OF PUBLIC WORKS D/B/A TACOMA RAIL MOUNTAIN
DIVISION**

David M. Tall
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**ATTORNEY FOR TACOMA STEEL
SUPPLY, INC. AND TSSI, LLC**

Dated: April 24, 2023

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB DOCKET NO. AB 1328X

CITY OF TACOMA, DEPARTMENT OF PUBLIC WORKS D/B/A TACOMA
RAIL MOUNTAIN DIVISION
--DISCONTINUANCE OF SERVICE EXEMPTION--
IN PIERCE COUNTY, WASHINGTON

COMES NOW, Tacoma Steel and interested party TSSI, LLC and
hereby object to the petition for allowance of surrebuttal by Tacoma Rail Mountain
Division. On the following bases:

1. Tacoma Rail Mountain Division does not demonstrate the required prejudice
to allow for leave for the Surface Transportation Board to consider a
surrebuttal.
2. The surrebuttal contains hearsay not supported in the record.
3. The Surface Transportation Board should not grant a summary
discontinuance, but rather set the appropriate hearing for development of the
record upon which to form a decision.

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Date: April 12, 2023

Respectfully submitted,

OSERAN HAHN P.S.

By: /s/DAVID M. TALL

David M. Tall, WSBA No. 12849

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**ATTORNEYS FOR TACOMA
STEEL SUPPLY, INC. AND TSSI,
LLC**

Certificate of Service

49 C.F.R. § 1104.12 – Service of Pleadings

I certify that I have this day, transmitted for services, copies of document upon all parties of record in this proceeding, by the method identified below:

Robert A. Wimbish Fletcher & Sippel LLC 29 North Wacker Drive, Suite 800 Chicago, IL 60606-3208 Email: rwimbish@fletcher-sippel.com Attorney for City of Tacoma, Department of Public Works D/B/A Tacoma Rail Mountain Division	Served by: Email
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Date: April 24, 2023

/s/ Brittany Ferguson
Brittany Ferguson
Paralegal, Oseran Hahn P.S.