

ENTERED  
Office of Chief Counsel  
August 18, 2025  
Part of  
Public Record

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August 18, 2025

Chief of Case Administration  
Office of Chief Counsel  
Surface Transportation Board  
Washington, DC 20423-0001

Re: FD 36836 NS Motion to Compel Against a Non-Party

Dear Chief:

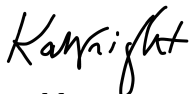
The Virginia Port Authority (“VPA”) and Virginia International Terminals, LLC (“VIT”), both non-parties to *Norfolk Southern. Corp. and Norfolk Southern. Ry. Co.—Acquisition of Control—Norfolk & Portsmouth Belt Line R.R. Co.*, FD 36836, received a motion to compel filed by Applicants on August 15, 2025. Although NS would like VPA and VIT to respond within ten (10) days (Motion at 6), Board rules provide VPA and VIT twenty (20) days to respond to a motion. 49 C.F.R. § 1104.13. VPA and VIT intend to respond within the timeline allotted to them by rule.

Further VIT has received a set of discovery served on it by Applicants on August 15, 2025, requesting a response within ten (10) days. VIT will respond to that set of discovery within the requested timeframe.

**Neither VPA nor VIT consent to becoming a party to this proceeding by the filing of this letter.**

Sincerely,

GENTRY LOCKE



Kathleen L. Wright  
*Counsel for Virginia Port Authority and  
Virginia International Terminals, LLC*

cc The Honorable Jenifer Soulikias, ALJ  
William A. Mullins, Esq.  
John V. Edwards, Esq.  
Crystal M. Zorbaugh, Esq.  
Peter W. Denton, Esq.

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