

ENTERED
Office of Chief Counsel
December 1, 2025
Part of
Public Record

ARU-2

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN
RAILWAY COMPANY

**AMENDED NOTICE OF INTENT TO PARTICIPATE
AND APPEARANCE OF COUNSEL**

The Brotherhood of Maintenance of Way Employees Division/IBT (“BMWED”); Brotherhood of Railroad Signalmen (“BRS”); International Association of Sheet Metal, Air, Rail and Transportation Workers-Mechanical Division (“SMART-MD”); the International Association of Machinists and Aerospace Workers District #19 (“IAM #19”) and the Transportation Communications Union/IAM (“TCU”) (collectively referred to herein as the “Allied Rail Unions” or “ARU”)¹ hereby give notice of their intent to participate in this Finance Docket as well as any related Sub-dockets, and enter the appearance of their counsel: Richard S. Edelman, and Aaron S. Edelman; Mooney, Green, Saindon, Murphy and Welch, P.C. The National Conference of Firemen and Oilers, 32BJ/SEIU and International Brotherhood of Boilermakers are no longer participating in this proceeding through the ARU.

¹There is no formal organization known as the “Allied Rail Unions”, rather that name has been adopted by these organizations for convenient collective reference in this proceeding; each organization is a separate participant in this proceeding.

The ARU take no position at this time with respect to merits of the proposed transaction(s), as to whether the proposed transaction could be approved under the requirements of the statute and the regulations governing “major mergers”, as to what conditions (other than those required under 49 U.S.C. §11326) should be attached to any approved transaction, or as to any conditions that may be sought by any other party.

Respectfully submitted,

/s/ Richard S. Edelman

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Date: December 1, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served one copy of the foregoing Notice of Intent To Participate and Appearance of Counsel, to the offices all Parties of Record as of the date of this filing by email using the addresses on the service list for this proceeding.

Date: December 1, 2025

/s/Richard S. Edelman
Richard S. Edelman