

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 36833

ENTERED
Office of Chief Counsel
January 15, 2026
Part of
Public Record

**LAMPWRIGHTS LLC –
PETITION FOR EXEMPTION TO
CONSTRUCT AND OPERATE A LINE OF RAILROAD
IN ELK AND JEFFERSON COUNTIES, PA**

MOTION TO EXTEND TIME FOR REPLY

Communications with respect to this pleading
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Counsel for First Apostles' Doctrine Church

Dated: January 15, 2026

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The First Apostles' Doctrine Church (the Church) hereby submits this Motion to Extend Time for Reply in response to Lampwrights LLC's (Lampwrights) Petition for Exemption (Lampwrights Petition). The Church requests an extension of the reply deadline to February 20, 2026. Good cause exists to grant the Church's request for more time to reply to the Lampwrights Petition since the Church has just engaged counsel and no detailed environmental information supporting the Lampwrights Petition appears to have yet been filed. A complete factual record and responses to Lampwrights' assertions are essential for the Board to make a fully informed decision. An extension will permit the Church to coordinate with undersigned outside counsel, whom it has just engaged to represent the Church in these proceedings. Granting an extension will not prejudice any party since no rail operations are currently ongoing and an extension will not affect the operations of the Greentree Landfill.

BACKGROUND

The Church is a property owner along the proposed right-of-way Petitioner seeks to use if the Lampwrights Petition is granted. Accordingly, the Church's interests are directly and immediately implicated by this proceeding.

ARGUMENT

Pursuant to the Board's regulations, a reply to any pleading must be filed within 20 days after the pleading is filed, unless otherwise provided. *See* 49 C.F.R. § 1104.13(a). However, the Board has discretion to extend the time for replies upon request and with good cause. *See id.* § 1104.7(b). The Church's request for an extension is being filed as early as possible in advance of January 22, 2026, the date by which the Board has instructed parties to file Replies to the Lampwrights Petition.¹ Requests for extensions of time are due not less than 10 days before the due date of the filing pursuant to the Board's regulations. 49 C.F.R. § 1104.13(b).

Good cause exists here. The Church seeks to understand the potential impacts of the proposed rail line and operations on its interests and as matter of public interest affecting the surrounding community. The Church conducts a significant outreach and shelter operation for individuals experiencing homelessness, and is concerned about the safety of the people it serves, many of whom must access the Church by foot.

An extension is also justified to permit the Church's newly engaged undersigned counsel to become acquainted with the facts and Lampwrights LLC's assertions and the extensive record already before the Board.

The proposed extension will not unduly delay this proceeding or prejudice Lampwrights LLC. Petitioner does not currently conduct or contract for rail operations to serve Greentree Landfill, so no ongoing commercial interest will be affected by a brief extension of time in this proceeding.

¹ Lampwrights LLC – Construction and Operation of a Line of Railroad – In Elk and Jefferson Counties, PA, Decision of STB Chief Counsel at 1, STB Docket No. 36833 (Service Date December 22, 2026).

WHEREFORE, and in view of the foregoing, the Church respectfully requests the Board extend the time for responding to the Lampwrights Petition to February 20, 2026.

Respectfully submitted on January 15, 2026.

/s/ Allison I. Fultz

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CERTIFICATE OF SERVICE

I certify that on January 15, 2026, I caused to be served a copy of the foregoing Motion for Extension of Time upon all parties of record in this proceeding by email.

/s/ Allison I. Fultz

Dated: January 15, 2026