



GENTRY LOCKE
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June 4, 2026

Via E-Filing and E-Mail

Judge Jennifer Soulikias
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

311552
ENTERED
Office of Chief Counsel
June 4, 2026
Part of
Public Record

Re: Proposed Deposition Subpoenas

***Finance Docket No. 36647, Lake Providence Port Commission – Feeder Line
Application – Line of Delta Southern Railroad Located in East Carroll and Madison
Parishes, Louisiana***

Dear Judge Soulikias:

Pursuant to the decision dated June 3, 2026, we are attaching two (2) proposed deposition subpoenas for your consideration and issuance. Counsel for the parties have conferred and agreed upon the date, time, and location for the depositions.

The proposed subpoenas include the dates, times and locations agreed upon, but counsel for the parties continue to discuss potential adjustments for convenience. We ask the Board's permission to so adjust, if necessary and convenient for the parties, without further amendment of the subpoenas.

If you have any questions regarding this filing, please feel free to contact me. Thank you for your assistance on this matter.

Respectfully submitted,

Noah P. Sullivan
Gentry Locke Attorneys
919 E. Main Street, Suite 1130
Richmond, VA 23219

Attorney for:
Delta Southern Railroad, Inc.

Enclosure

cc: Parties of Record
Non-party Witness Counsel

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 36447

**LAKE PROVIDENCE PORT COMMISSION – FEEDER LINE APPLICATION – LINE
OF DELTA SOUTHERN RAILROAD LOCATED IN EAST CARROLL AND MADISON
PARISHES, LOUISIANA.**

**SUBPOENA TO TESTIY IN A DEPOSITION TO
PATRECIA HARGROVE, ON BEHALF OF
SOUTHEAST ARKANSAS ECONOMIC DEVELOPMENT DISTRICT, INC.**

To: Patrecia Hargrove, Executive Director
Southeast Arkansas Economic Development District, Inc.
315 East 8th Avenue
Pine Bluff, AR 71601

Pursuant to the rules of the Surface Transportation Board governing discovery, 49 C.F.R §
1114, *et seq.*, and by Order of the Board:

YOU ARE HEREBY COMMANDED to appear at the Pine Bluff Main Library Board
Room, 600 S. Main Street, Pine Bluff, Arkansas 71601 at 9:00 a.m. on June 16, 2026, to provide
testimony by oral deposition at the request of Delta Southern Railroad, Inc., in the above-caption
proceeding. Your testimony will be recorded stenographically, by an officer authorized to
administer oaths, and may be used as evidence in this proceeding. The deposition is anticipated
to be completed within one (1) day, but may be continued from time to time until completed.
Specific topics for which you will be expected to provide testimony are included in Attachment A
to this subpoena.

DATED: June 5, 2026

Clerk of STB Seal

ATTACHMENT A TO SUBPOENA FOR DEPOSITION TESTIMONY

Delta Southern Railroad, Inc. (“DSRR”) seeks to depose you in order to obtain relevant evidence to the Lake Providence Port Commission’s (“LPPC”) Amended Feeder Line Application to acquire the line of DSRR located in East Carroll and Madison Parishes, Louisiana, STB Docket No. FD 36447 (the “proceeding”). Specifically, DSRR seeks testimony regarding the following topics:

1. Current and anticipated demand for rail service on the portion of rail line from milepost (“MP”) 471.0 to MP 498.44 of the DSRR line that runs from Lake Providence, Louisiana (MP 471.0) to the point of interchange with the Kansas City Southern Railway Company (“KCS”) at Tallulah, Louisiana (the “Line”).
2. The 2019-2020 INFRA Grant awarded in connection with the Line.
3. Administration of the INFRA Grant, including, but not limited to, Grant expenditures, work performed to the Line in connection with the Grant, and communications with third-parties relating to allocation of Grant funds.
4. All grants SEAEDD has applied for, received, or been denied relating to the Line from 2019 to present.
5. Communications with LPPC concerning the Line, the INFRA Grant, and/or DSRR.
6. Communications with any government agency, employee or official concerning the Line, the INFRA Grant, and/or DSRR.
7. Communications with Madison Parish Port Commission regarding the Line, the INFRA Grant, and/or DSRR.
8. Communications with DSRR concerning the Line, the INFRA Grant, and/or rail service.

9. Rail service provided by DSRR.
10. Interchange of freight between DSRR and other railroads.
11. Rail service provided by North Louisiana and Arkansas Railroad, Inc. (“NLA”).
12. Communications with NLA regarding past, present, or anticipated future operation on the Line.
13. Communications with NLA regarding DSRR, the Line, and/or the INFRA Grant.
14. All contracts or agreements SEAEDD has entered into related to the Line.
15. SEAEDD’s responses to discovery requests propounded in this proceeding.

Respectfully Submitted,

/s/ John M. Scheib

John M. Scheib
Noah P. Sullivan
William L. Spotswood
Gentry Locke Attorneys
101 W. Main Street, Suite 750
Norfolk, VA 23510
757-916-3511

Attorneys for:
Delta Southern Railroad, Inc.

June 5, 2026

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 36447

**LAKE PROVIDENCE PORT COMMISSION – FEEDER LINE APPLICATION – LINE
OF DELTA SOUTHERN RAILROAD LOCATED IN EAST CARROLL AND MADISON
PARISHES, LOUISIANA.**

**SUBPOENA TO TESTIY IN A DEPOSITION TO W. BRYANT KILLEN, ON BEHALF
OF LAKE PROVIDENCE PORT COMMISSION**

To: W. Bryant Killen, Port Director
Lake Providence Port Commission
409 Port Road
Lake Providence, Louisiana 71254

Pursuant to the rules of the Surface Transportation Board governing discovery, 49 C.F.R §
1114, *et seq.*, and by Order of the Board:

YOU ARE HEREBY COMMANDED to appear at the East Carroll Parrish Library
Conference Room, 109 Sparrow Street, Lake Providence, Louisiana 71254 at 9:30 a.m. on June
17, 2026, to provide testimony by oral deposition at the request of Delta Southern Railroad, Inc.,
in the above-caption proceeding. Your testimony will be recorded stenographically, by an officer
authorized to administer oaths, and may be used as evidence in this proceeding. The deposition is
anticipated to be completed within one (1) day, but may be continued from time to time until
completed. Specific topics for which you will be expected to provide testimony are included in
Attachment A to this subpoena.

DATED: June 5, 2026

Clerk of STB Seal

ATTACHMENT A TO SUBPOENA FOR DEPOSITION TESTIMONY

Delta Southern Railroad, Inc. (“DSRR”) seeks to depose you in order to obtain relevant evidence to the Lake Providence Port Commission’s (“LPPC”) Amended Feeder Line Application to acquire the line of DSRR located in East Carroll and Madison Parishes, Louisiana, STB Docket No. FD 36447 (the “proceeding”). Specifically, DSRR seeks testimony regarding the following topics:

1. Current and anticipated demand for rail service on the portion of rail line from milepost (“MP”) 471.0 to MP 498.44 of the DSRR line that runs from Lake Providence, Louisiana (MP 471.0) to the point of interchange with the Kansas City Southern Railway Company (“KCS”) at Tallulah, Louisiana (the “Line”).
2. LPPC’s financial position from 2023 to present, including, but not limited to, its assets, debts, liabilities, and income from any source.
3. LPPC’s ability to purchase the Line.
4. LPPC’s plans to finance purchase of the Line and to operate the Line for three years.
5. All bond applications submitted on behalf of LPPC in connection with the Line and communications related thereto.
6. All grant applications submitted in connection with or on behalf of LPPC relating to the Line.
7. LPPC’s plans for operating the Line.
8. The 2019-2020 INFRA Grant awarded in connection with the Line.
9. Communications with the Southeast Arkansas Economic Development District (“SEAEDD”) regarding the Line, the INFRA Grant, and/or DSRR.

10. Communications with any government agency or official concerning the Line, the INFRA Grant, and/or DSRR.
11. Communications with Madison Parish Port Commission regarding the Line, the INFRA Grant, and/or DSRR.
12. Rail service provided by North Louisiana and Arkansas Railroad, Inc. (“NLA”).
13. Communications with NLA regarding past, present, or anticipated future operation on the Line.
14. All contracts or agreements LPPC has entered into related to the Line.
15. Rail service provided by DSRR.
16. Interchange of freight between DSRR and other railroads.
17. Communications with DSRR regarding the INFRA Grant, the Line, and/or rail service.
18. LPPC’s relationship to the Northeast Louisiana Multimodal District or the Northeast Louisiana Railroad Development District.
19. LPPC’s responses to discovery requests propounded in this proceeding.

Respectfully Submitted,

/s/ John M. Scheib

John M. Scheib
Noah P. Sullivan
William L. Spotswood
Gentry Locke Attorneys
101 W. Main Street, Suite 750
Norfolk, VA 23510
757-916-3511

Attorneys for:
Delta Southern Railroad, Inc.

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