

RICHARD H. STREETER
ATTORNEY AT LAW
5255 Partridge Lane N.W.
Washington, D.C. 20016
Tele; 202-210-4761
rhstreeter@gmail.com

ENTERED
Office of Chief Counsel
June 25, 2026
Part of
Public Record

VIA E-FILING

June 17, 2026

Administrative Law Judge Jenifer Soulikias

Re: STB Docket No. 36447; *Lake Providence Port Commission - Feeder Line Application – Line of Delta Southern Railroad Located in East Carroll and Madison Parishes, LA.*

Dear Judge Soulikias:

On June 16, 2026, Delta Southern Railroad, Inc. (“DSRR”) filed a Motion to Compel the North Louisiana & Arkansas Railroad, Inc. (“NL&A”) to supplement its responses and objections to DSRR’s discovery requests dated March 19, 2026 (which are the first part of Exhibit B to the Motion to Compel, NLA-00796-814, pdf pages 14-32) and respond to DSRR’s discovery requests dated May 6, 2026.

As is reflected by NL&A’s *Responses to Requests for Admission, Third Set of Interrogatories and Second Set of Request for Production of Documents*, which are attached, as stated above, which are part of Exhibit B to DSRR’s Motion to Compel, were previously served on DSRR’s counsel. As is reflected by page NLA_000815, enclosed herewith, the Affidavit Daniel B. Robbins, NL&A’s President, those NL&A’s Responses were duly served on DSRR’s counsel on April 10, 2026.

After reviewing DSRR’s Motion to Compel, and particularly with respect to DSRR’s Fourth Set of Interrogatories and Third Set of Requests for Production of Documents, which are the second part of Exhibit B to the Motion to Compel (pdf pp. 33 – 41), I cannot explain why NLA’s Responses to those Requests and the other documents enclosed herewith, which were prepared some time ago, were not previously served on DSRR’s counsel by June 5, 2026, but those Responses are now enclosed herewith. Also enclosed herewith are the “Highly Confidential,” reviewed (i.e., audited) year-end financial results for NL&A’s parent company, Arkansas Short Line Railroads, Inc. (“ASL”) for the years ending December 31, 2023 and 2022 (NLA_000816-840), and similar reviewed financial results for the year ending December 31, 2024 and 2023 (NLA_841-865), which are responsive to DSRR’s discovery requests. However, the failure to serve those Responses and financial results on DSRR’s counsel at

an earlier time was an oversight, and therefore was inadvertent.¹ As we have explained to DSRR's counsel (see Exhibit A to the Motion to Compel), the reviewed 2025 Financial Statement for Arkansas ShortLine Railroads, Inc. has not been provided to NL&A as of this date, but will be promptly provided to DSRR's counsel when it becomes available.

We are preparing a Reply for NL&A to the Motion to Compel. However, service of the enclosed documents, and subsequent service of similar financial results for ASL for the year ending December 31, 2025 and 2024, makes a substantial portion of the Motion to Compel moot. In that Reply, we will explain that providing year-end financial results for ASL, as we are doing (and will do for the most recent year when it becomes available to NL&A), should cause Your Honor to deny the remainder of the Motion to Compel that is not moot, because, for example, the only relevant information, or information likely to lead to relevant information with respect to NLA's financial position, is reflected in those reviewed year-end financial statements. Other information sought by DSRR such as the amounts of NL&A's cash on hand at any given, arbitrarily defined point in time, is neither relevant nor likely to lead to relevant information herein, because the statutory issue is NL&A's financial results. In any event, Mr. Robbins was questioned about such matters in his February 26, 2026 deposition and explained how NL&A's and ASL's bank accounts were maintained, which we intend to further explain in NLA's Reply.

If you have any questions, please give us a call.

Respectfully submitted,

Richard H. Streeter
/s/ Richard H. Streeter

Michael F. McBride
/s/ Michael F. McBride

Richard H. Streeter
Law Office Richard H. Streeter
5255 Partridge Lane, N.W.
Washington, D.C. 20016

Michael F. McBride
Van Ness Feldman, LLP
2000 Pennsylvania Ave., N.W.
Suite 6000
Washington, D.C. 20006

Attorneys for North Louisiana & Arkansas Railroad, Inc.

Certificate of Service

¹ We note that DSRR's counsel did not ask the undersigned why those Responses and financial results had not been served before filing the Motion to Compel. Had they done so, we would have realized our oversight and promptly provided them, as we are now doing.

I, Richard H. Streeter, do hereby certify that, on June 17, 2026, a true copy of the foregoing with attachment was served on the following Parties of Record, via email:

ALJ Jennifer Soulikias: a.j.soulikias.inbos@stb.gov

Delta Southern Railroad, Inc.

c/o John M. Scheib scheig@gentrylocke.com.

Noah P. Sullivan NSullivan@gentrylocke.com.

William L. Spotswood Spotswood@gentrylocke.com

Timothy Crowley at tim@lepeabody.com

Thomas D. Crowley at tc@lepeabody.com

In addition, true copies were served, consistent with 49 C.F.R. § 1152.1(a) on the following:

- (1) All rail patrons who originated and/or received traffic on the line during
The 12-month period preceding the month in which the amended
Application was filed:

mark.marionneaux@jcabnukker.cin

bryant.bremer@keanmiller.com

Counsel for Helena Chemical/South Delta Fertilizer

Dan Militaru

Rail Vehicle Services

dan.militaru@railcarco.com

Jerry J. Melton

Complex Chemical.com

jmelton@complexchemical.com

Neil Martin

Terral River Service, Inc.

nmartin@terralriverservice.com

- (2) The designated State agency of the State where the property is located:

Louisiana Department of Transportation and Development

andrew.barry@la.gov

sanettria.pleasant2@la.gov

- (3) County governments where the line is located:

East Carroll Parish Police Jury

Kendall Thompson, President

Ecpj400@att.net

Madison Parish Police Jury
Jane Sanders, President
msmith_mppj@bellsouth.net

William L. Mencer
william@mencerlaw.com

Glover Alcorn "Russ" Russell, Jr.
Russ@gloverrussell.com

Jacob A. Brister
jacob@bristerlaw.com

Ernesto Andre Silva Cruz
ernestoc@terralriverservice.com

Richard H. Streeter

/s/ Richard H. Streeter