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ENTERED
Office of Chief Counsel
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June 29, 2026

Ms. Cynthia T. Brown
Chief of Case Administration
Office of General Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Docket No. NOR 42187, *VFRC, LLC, et al. v. Portland & W. R.R., Inc., et al.*

Dear Ms. Brown:

By this letter, the undersigned enters an appearance as counsel for Defendant Union Pacific Railroad Company (“Union Pacific”).

On June 8, 2026, VFRC, LLC, Venell Farms, Inc., and Albany & Eastern Railroad Company (together, “Complainants”) filed an Amended Complaint in the above-referenced docket. The Amended Complaint names Union Pacific as defendant for the first time in this proceeding, and Complainants served the Amended Complaint on Union Pacific’s registered agent in Delaware by process server on June 15, 2026. Accordingly, pursuant to 49 C.F.R. § 1111.5(c), Union Pacific will respond to the Amended Complaint no later than July 6, 2026.

Respectfully submitted,

/s/ Matthew J. Warren

Matthew J. Warren

Counsel for Union Pacific Railroad Company

cc: All parties of record