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July 21, 2026

CN-24

**VIA ELECTRONIC FILING**

Hon. Jenifer J. Soulikias  
Administrative Law Judge  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423-0001

Re: **Docket No. FD 36873 - Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company**

Dear Judge Soulikias:

I write on behalf of Grand Trunk Corporation and its U.S. rail operating subsidiaries (collectively, “CN”) in response to Union Pacific Corporation, Union Pacific Railroad Company, Norfolk Southern Corporation, and Norfolk Southern Railway Company’s (collectively, the “Applicants”) July 16, 2026 Motion to Compel Non-Applicant Railroads<sup>1</sup> to produce car and train event, reciprocal switching, and interchange data (the “Motion to Compel”). Applicants have sought this data pursuant to Requests 18, 19, 20 and 21 of Applicants’ Second Set of Discovery Requests to Grand Trunk Corporation.

Your Honor should deny Applicants’ motion as it relates to CN for the fundamental reason that Applicants have mischaracterized CN’s position: In fact, CN has agreed to produce data in response to Requests 20 and 21 and has not refused to produce data in response to Requests 18 and 19. Ex. A (L. Fresquez email to K. Kelly, July 16, 2026, 11:51 AM ET). CN confirmed its position by email to Applicants six hours before they served the Motion to Compel. *See id.* Thus, Applicants were aware or should have been aware that their assertion with respect to CN—that “CN refuses to produce data in response to Requests 18 and 19”—was a misstatement. *See* MTC fn. 7.

In recent conferrals, CN has invited Applicants to explain the relevance of the data sought by Requests 18 and 19 (“car and event data”) and has offered to continue to meet and confer on a

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<sup>1</sup> Applicants moved to compel BNSF, CN, CPKC, and CSX altogether, though this motion focuses only on the arguments related to CN.

reasonable scope. CN's invitation is not a mere formality; CN had hoped to better understand Applicants' claims as to the relevance of the event data and to explore whether less burdensome alternatives exist. The relevance of CN's event data is not obvious: (i) the Amended Application does not reference or implicate CN's event data and it is not clear how CN's event data is relevant to Applicants' claims related to the proposed merger of Applicants' rail lines; and (ii) CN itself has not referenced or implicated its event data in its submissions to the Board and has not sought event data from Applicants. Moreover, due to the sheer size and volume of this data, the burden of collecting and producing car and event data is no small task, and the burden associated with collecting and producing incremental years of data is substantial. Applicants have requested, without justification, train and car event data for the entirety of the CN network, for a six-year period, without any proposal or offer to narrow the scope. Thus, CN has asked for and remains willing to explore compromise positions that give Applicants relevant data but that do not impose such substantial costs and burden on CN. Unfortunately, instead of engaging in such dialogue, Applicants simply filed the Motion to Compel, forcing CN to engage with Applicants' premature motion practice instead of good faith negotiations.

Applicants' Motion to Compel is therefore not ripe. Nevertheless, to the extent they insist on compelling CN to produce its full scope of event data for a six-year period, CN objects to such a motion at this juncture because Applicants have made no showing of relevance. While CN remains open to exploring compromise, any such compromise would be predicated upon a real dialogue, with Applicants substantiating the basis for their request and offering an appropriate narrowing of their request to lessen the burden on CN.

## **I. Background**

Applicants served their Second Set of Discovery Requests on CN and the other Non-Applicant Railroads on June 1, 2026. Among the requests were four data requests seeking car and train event, reciprocal switching, and interchange data, Requests 18 through 21. CN served its responses and objections to the Second Set of Discovery Requests on June 16, 2026. As to the data requests, CN raised relevance and burden objections but nevertheless offered to meet and confer. Applicants reached out to request a meet and confer on July 6. On July 8, Applicants and Non-Applicant Railroads jointly met and conferred, during which Applicants flagged the data requests as high priority. Non-Applicant Railroads again raised relevance and burden concerns, including specifically as to CN and CPKC the fact that these two non-Applicant railroads had not requested similar data from Applicants and that they are in any event differently situated from Applicants given their different geographic footprints. Applicants agreed during the July 8 conferral to follow up with further justification for the data requests.

On July 14, Applicants responded with purported justifications for the data requests. These arguments mirror the substance of their Motion to Compel, namely that because the data was requested of Applicants, it is fair for them to request it of Non-Applicant Railroads. The email did not address the CN or CPKC-specific issues of relevance. But the email did impose an arbitrary deadline by which they expected responses from the Non-Applicant Railroads.

CN responded to Applicants in line with the proposed deadline on July 16. In response, CN explicitly *agreed to produce* the reciprocal switching and interchange data requested in Requests 20 and 21. CN also stated that it would like to reach a compromise on the event data requested in Requests 18 and 19—it did *not* refuse to produce this data, as Applicants' Motion to Compel misleadingly states. MTC fn. 7. But CN did again flag relevance and burden concerns

with the requested event data and asked that the parties discuss a way to lessen those concerns. Applicants did not respond before filing the Motion to Compel.

Applicants' Motion to Compel does not address CN's relevance or burden arguments. Rather, it assumes a refusal to produce (where there is none), relevance (which is unsupported), and lack of burden (which is inaccurate).

## II. Argument

Applicants' Motion to Compel CN to produce data should be dismissed because Applicants misrepresent CN's position, and there is no ripe dispute. Applicants claim efficiency but their premature Motion to Compel accomplishes the opposite: it wastes everyone's time. CN has agreed to produce much of the data Applicants request and has asked to meet and confer further on the rest to address specific relevance and burden concerns Applicants have so far ignored. In prior STB proceedings, even UP has recognized the futility of a motion to compel when a party has already agreed to produce responsive documents. *See Union Pacific Railroad Company's Reply to Motion to Compel Discovery, North America Freight Car Assoc., et al. v. Union Pacific Railroad Company*, NOR 42144 (filed June 17, 2016) (UP arguing that the Board "should end this non-dispute by denying the motion"). And the Board has explained that "parties should discuss and attempt to resolve [] disputed discovery requests. As a general rule, the Board expects parties to try to resolve their differences on their own before involving the Board." *CF Indus., Inc. v. Kanab Pipeline Partners, L.P.*, NOR 42084, slip op. at 2 (STB served Nov. 23, 2004). Applicants have not done so, and there is no genuine dispute for Your Honor to rule on here because there is no impasse at this time.

But in all events, Applicants have not justified the substantial burden that collecting the event data would entail in light of how irrelevant CN's event data is to the proposed transaction. *See Appl. of National Railroad Passenger Corp.—Canadian National Ry. Co.*, FD 35743 (STB served Sept. 23, 2014) ("discovery may be denied if it would be unduly burdensome in relation to the likely value of the information sought"). As CN flagged in its July 16 email, Applicants have not explained why CN's event data in particular is relevant to the proceeding. Applicants' only argument is that there are "reciprocal obligations to engage in discovery," and that Applicants only seek data equal to what has been sought of them. MTC at 3. But the Amended Application does not rely on CN data, CN has not yet filed a responsive application or comment that relies on this data, and CN has not otherwise put this data at issue in the case. Even Applicants concede that they only want the data because it *may* become relevant later. *See id.* (contending without any stated basis that the data is "critical" to respond to criticisms or alternative analyses that other railroads "may present" later). But they have not explained why CN's event data in particular is relevant *now*.

Moreover, the suggestion that the "burden of collecting and producing the data is likely minimal" is incorrect as well as utterly unsupported. MTC at 3. CN has already told Applicants exactly that in its July 16 email. Pulling the requested data is not simple given the sheer volume of information Applicants request, and Applicants have not proposed any reasonable scope limitations.<sup>2</sup> *See Duke Energy Corp. v. Norfolk S. Ry.*, NOR 42069, et al., slip op. at 4 (STB served

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<sup>2</sup> Not only is it burdensome, but this event data is particularly sensitive even in comparison to 100% traffic tapes and other confidential data sets that CN has already produced or agreed to produce to Applicants. CN closely guards access to these event data sets due to the potential harm

July 26, 2002) (“[D]iscovery requests must be narrowly drawn, directed toward a relevant issue, and not used for a general fishing expedition.”). Simply because Applicants were able to pull the data does not mean that CN would be able to do so without significant burden. CN sought “clarification [and] reasonable accommodation” for its burdens, but Applicants ignored those requests. MTC at 3. Without addressing the actual burden on CN, Applicants have failed to establish why compulsion of responses to the data requests is required.

\* \* \*

Applicants’ profession of “willingness to engage in good-faith discussions” rings hollow when they failed to respond to CN’s request for further discussion and instead filed the Motion to Compel. MTC at 3. Accordingly, CN respectfully requests that Your Honor deny Applicants’ Motion to Compel as to CN.

Respectfully submitted,

/s/ Sara Y. Razi

Sara Y. Razi

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posed by disclosure—including the risk of misuse or misunderstanding should they be used outside CN—making the bar for proving Applicants’ need of the data even higher. *See Keokuk Junction Ry. Co. – Feeder Line Acquisition – Line of Toledo Peoria and Western Ry. Co.*, FD 34335, slip op. at 5 (STB served Nov. 13, 2003) (“Pioneer’s strategic growth plan is a sensitive corporate record, and TP&W has not shown that it needs the information to challenge KJRY’s argument that its Application meets the statutory standard.”); *Canadian Pac. Ry.—Control—Kan. City S.*, FD 36500, slip op. at 2 (STB served Apr. 13, 2022) (citing *CSX Corp.—Control & Operating Leases/Agreements—Conrail Inc.*, FD 33388, slip op. at 3 (STB served Nov. 10, 1997)) (“The Board has held that the disclosure of extraordinarily sensitive information should not be required without a careful balancing of the seeking party’s need for the information, and its ability to generate comparable information from other sources, against the likelihood of harm to the disclosing party.”).

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 21st day of July 2026, I caused a true and correct copy of the foregoing to be served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General, and Administrative Law Judge Jenifer Soulikias.

/s/ Andrew Bernstein

Andrew Bernstein

Sr. Paralegal Manager

Simpson Thacher & Bartlett LLP

## **Exhibit A**

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**From:** Fresquez, Laurel  
**Sent:** Thursday, July 16, 2026 11:51 AM  
**To:** 'Kelly, Kevin'  
**Cc:** 'Flahive Wu, Laura'; 'Ludwin, Derek'; 'Rosenthal, Michael'; 'Damitio, Daniel'; 'Warren, Matthew J.'; 'Korman, Marc'; 'ratkins'; 'Laudone, Stephen S.'; 'William Mullins'; 'Spencer Naake'; 'OpalDisco@cov.com'; 'Magcale, Jamie Dominique U'; 'Thompson, McClain'; Ellis, Abram J; 'Matelisj@sullcrom.com'; 'Donovan, Daniel T.'; 'McCarrick, T.J.'; Razi, Sara Y.; Bohl, Lindsey C.; 'David Meyer'; \*pdenton@steptoe.com; 'tstrafford@steptoe.com'; 'Cunningham, Rich'; 'Scheib, John M.'; 'Gardiner, Kent'; 'van Houwelingen, Luke'; 'Aluise, Dylan M.'; 'Hynes, Samantha F.'; 'Golden, Nathan H.'; 'Joseph, Neil'; 'Volbrecht, Tate D.'; 'Enson, Eric'; 'Fanchiang, Eric'; Bohl, Lindsey C.; Gridi, Avia; 'Vaidya, Tushar'  
**Subject:** RE: FD 36873 - Applicants' 2nd Set of Discovery Requests - Data Requests

Counsel,

In response to Requests 20 and 21, CN agrees to conduct a reasonable search and produce data available in the ordinary course covering no more than the same level of detail and time as contained in the data UP and NS have produced thus far in the proceeding. We are working to collect the data and will produce it as soon as we are able.

As to the event data requested in Requests 18 and 19, Applicants' email does not explain why CN's event data in particular is relevant to the proceeding. The Amended Application does not rely on CN's event data, and CN did not request this data from Applicants, and so any argument of relevance by virtue of reciprocity falls flat. Nor has CN otherwise put this data at issue in the case, and so it remains irrelevant unless and until CN uses it in connection with any comment or responsive application. Moreover, the suggestion that this data is not burdensome to produce is incorrect. Pulling the requested data is not simple given the sheer volume of information Applicants request, and Applicants have not proposed any reasonable scope limitations. Accordingly, CN would welcome further meet and confer discussions to discuss a more reasonable scope of data for production in the hopes of reaching a compromise with Applicants.

Best,  
Laurel

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Laurel Fresquez  
*Pronouns: (she/her/hers)*  
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**From:** Kelly, Kevin <[Kkelly@cov.com](mailto:Kkelly@cov.com)>  
**Sent:** Tuesday, July 14, 2026 7:01 PM  
**To:** Magcale, Jamie Dominique U <[JMagcale@cov.com](mailto:JMagcale@cov.com)>; Thompson, McClain <[mcclain.thompson@kirkland.com](mailto:mcclain.thompson@kirkland.com)>; Ellis, Abram J <[AEllis@stblaw.com](mailto:AEllis@stblaw.com)>; Matelis, Joseph (NON-SIDLEY @SULLCROM.COM ) <[Matelisj@sullcrom.com](mailto:Matelisj@sullcrom.com)>; Donovan, Daniel T. <[ddonovan@kirkland.com](mailto:ddonovan@kirkland.com)>; McCarrick, T.J. <[tj.mccarrick@kirkland.com](mailto:tj.mccarrick@kirkland.com)>; Razi, Sara Y.

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**Subject:** RE: FD 36873 - Applicants' 2nd Set of Discovery Requests - Data Requests

\*\*\* External Email \*\*\*

Counsel,

At a recent meet and confer, certain non-applicant railroads asked Applicants to explain the relevance of the reciprocal traffic data requests that Applicants have served on the non-applicant railroads (which are numbered 18-21 in each set of requests). In particular, non-applicant railroads asked for an explanation of the relevance of event data requests, which Applicants provide below.

Car and train event data is produced as a matter of course in a range of STB proceedings, including prior merger proceedings. For example, in the CP-KCS proceeding the applicants requested that other railroads produce “system-wide car and container event data,” and this data was produced. See, e.g., Request No. 54, Applicants’ First Set of Interrogatories and Second Set of Discovery Requests, STB Fin. Docket 36500 (served Mar. 16, 2022). While waybill data may include basic transportation characteristics like origin and destination, only event data provides operational information on how traffic moves over the network, which is necessary to assess any claims that might be made by nonapplicant railroads about the impact of the proposed transaction on their service and operations or any conditions they may propose. Moreover, event data is maintained and used in the ordinary course of business, and production of those data files is not unduly burdensome, particularly for sophisticated Class I railroads.

Indeed, the STB’s merger rules reflect an expectation of reciprocal traffic data discovery for railroads who choose to participate in the proceeding. Under 49 § 1180.4(b)(4)(iii), applicants are permitted to condition their disclosure of their 100% traffic tapes to other railroads on those railroads’ commitment to do the same. Here, Applicants responded to non-applicant railroads’ request for event data without objection, and non-applicants have no basis to resist production of the exact same forms of traffic data that they have requested and have received.

There was also a question about whether Request 21 asks for information duplicative of previously produced waybill data. This request was directed at information “sufficient to show” the requested information on interchange volumes and associated payments between carriers, and non-applicant railroads are free to point to their waybill data if that data provides a sufficient answer to some or all of the information requested by Request 21. As we discussed on the call, some of the requested information like haulage or switching payments between railroads may not be reflected in waybills. But that is a question that each nonapplicant railroad should answer based on its own data.

As it stands, none of the non-applicant railroads have agreed to produce the reciprocal data that was requested. Please let us know promptly, and by no later than Thursday at 12 PM ET, if that has changed.

Best,

Kevin

## Kevin Kelly

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# COVINGTON

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**From:** Magcale, Jamie Dominique U <[JMagcale@cov.com](mailto:JMagcale@cov.com)>

**Sent:** Wednesday, July 8, 2026 3:17 PM

**To:** Thompson, McClain <[mcclain.thompson@kirkland.com](mailto:mcclain.thompson@kirkland.com)>; Kelly, Kevin <[Kkelly@cov.com](mailto:Kkelly@cov.com)>; \*AEllis@stblaw.com2 <[AEllis@stblaw.com](mailto:AEllis@stblaw.com)>; Matelis, Joseph (NON-SIDLEY @SULLCROM.COM ) <[Matelisj@sullcrom.com](mailto:Matelisj@sullcrom.com)>; Donovan, Daniel T. <[ddonovan@kirkland.com](mailto:ddonovan@kirkland.com)>; McCarrick, T.J. <[tj.mccarrick@kirkland.com](mailto:tj.mccarrick@kirkland.com)>; Razi, Sara Y. <[Sara.Razi@stblaw.com](mailto:Sara.Razi@stblaw.com)>; Bohl, Lindsey C. <[Lindsey.Bohl@stblaw.com](mailto:Lindsey.Bohl@stblaw.com)>; David Meyer <[david@meyerlawdc.com](mailto:david@meyerlawdc.com)>; \*pdenton@steptoe.com <[pdenton@steptoe.com](mailto:pdenton@steptoe.com)>; \*tstrafford@steptoe.com <[tstrafford@steptoe.com](mailto:tstrafford@steptoe.com)>; Cunningham, Rich <[rich.cunningham@kirkland.com](mailto:rich.cunningham@kirkland.com)>; Scheib, John M. <[scheib@gentrylocke.com](mailto:scheib@gentrylocke.com)>; Gardiner, Kent <[KGardiner@crowell.com](mailto:KGardiner@crowell.com)>; van Houwelingen, Luke <[LVanHouwelingen@crowell.com](mailto:LVanHouwelingen@crowell.com)>; Aluise, Dylan M. <[aluised@sullcrom.com](mailto:aluised@sullcrom.com)>; Hynes, Samantha F. <[hyness@sullcrom.com](mailto:hyness@sullcrom.com)>; Golden, Nathan H. <[goldenn@sullcrom.com](mailto:goldenn@sullcrom.com)>; Joseph, Neil <[neil.joseph@kirkland.com](mailto:neil.joseph@kirkland.com)>; Volbrecht, Tate D. <[tate.volbrecht@kirkland.com](mailto:tate.volbrecht@kirkland.com)>; Enson, Eric <[EEnson@crowell.com](mailto:EEnson@crowell.com)>; Fanchiang, Eric <[EFanchiang@crowell.com](mailto:EFanchiang@crowell.com)>; \*Avia.Gridi@stblaw.com <[Avia.Gridi@stblaw.com](mailto:Avia.Gridi@stblaw.com)>; Vaidya, Tushar <[tushar.vaidya@kirkland.com](mailto:tushar.vaidya@kirkland.com)>

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**Subject:** RE: FD 36873 - Applicants' 2nd Set of Discovery Requests

McClain,

Thank you again for providing your availability to meet and confer. We look forward to discussing Applicants' second set of discovery requests and our July 6 letter further during today's call. To address the points you raised below:

**First**, we appreciate your confirmation that BNSF has agreed to conduct a reasonable search for Requests Nos. 6–8, 16, and 22, and to meet and confer on Requests Nos. 11–14, 17–21, and 23–30. However, agreeing to take those steps is not the same as actually searching for, let alone producing, responsive documents. Indeed, we do not know whether BNSF has actually conducted any searches in response to these requests and, to date, BNSF has produced zero documents in response to any of Applicants' discovery requests. Has BNSF taken any steps to search in response to the referenced requests? If so, what are those steps for each request?

**Second**, with respect to BNSF's relevance, proportionality, and burden concerns, our July 6 letter and prior communications address these issues directly. Applicants' requests seek documents on topics that are directly relevant to this proceeding and that, in many cases, BNSF itself has placed at issue through the discovery it has sought from Applicants and its public statements regarding the Proposed Transaction. Any argument on burden or proportionality of burden to relevance is the responsibility of BNSF to make. BNSF has not

articulated any specific burden. We disagree that the requests Applicants have made are disproportional or unduly burdensome, but we are hopeful that the parties can address any burden-related issues through the negotiation of appropriate search terms, custodians, and/or de-duplication. We look forward to discussing those with you.

**Third**, as to the question of reciprocity, we disagree with BNSF's framing. Applicants are seeking relevant, proportional discovery from a voluntary participant in this proceeding. BNSF elected to participate as a party, has launched a robust public relations campaign against the Proposed Transaction, has served extensive discovery requests on Applicants, and has indicated it may submit evidence and argument in opposition to the merger. As we discussed during our meet and confer on June 30, the Board's regulations provide for broad discovery, the Board's discovery rules apply to all parties, and nothing in those rules creates a lower standard for non-Applicant parties. See 49 C.F.R. § 1114.21(a)(1); see also *Canadian Pac. Ry.—Control—Kan. City S.* (Decision No. 7), FD 36500, slip op. at 4 (Aug. 2, 2021); *CSX Transp. & Del. & Hudson Ry.—Joint Use Agreement*, FD 35348, slip op. at 3 (STB served Aug. 16, 2010). Thus, as parties, BNSF and the other non-Applicant railroads are subject to discovery. To the extent you possess relevant information, we are entitled to obtain it in discovery, subject to proportionality/burden analyses. As noted above, we disagree that the requests Applicants have made are disproportional or unduly burdensome, but any concerns can be addressed through negotiation of custodial search parameters. We look forward to discussing those with you.

**Fourth**, we recognize that targeted, non-custodial collections and searches may be appropriate for data-specific requests, such as Request Nos. 18-21. However, for all other requests – especially those seeking communications and documents that would not likely be housed in centralized, non-custodial repositories – we believe custodial searches are appropriate. We look forward to discussing this with you further.

Applicants reserve all rights.

Thanks,

Jamie

**Jamie Magcale**

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**COVINGTON**

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**From:** Thompson, McClain <[mcclain.thompson@kirkland.com](mailto:mcclain.thompson@kirkland.com)>

**Sent:** Tuesday, July 7, 2026 9:45 AM

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**Subject:** RE: FD 36873 - Applicants' 2nd Set of Discovery Requests

**[EXTERNAL]**

Kevin –

We write for BNSF in response to UP's July 6 letter. We disagree with it on several grounds.

**First**, UP's letter ignores that we have agreed to conduct a reasonable search in response to five of the requests (Nos. 6-8, 16, and 22) and offered to meet and confer on 17 of the other requests (Nos. 11-14, 17-21, 23-30). We also agreed to provide rolling productions and keep you apprised of the timing of those rolling productions. As a result, much of UP's letter—which is premised on a narrative that we are refusing to search—is not particularly relevant, productive, or even close to being true.

**Second**, UP's letter fails to specifically respond to any of the relevance, proportionality, and burden concerns that we raised. It would be more productive for UP to engage on the issues we raised rather than ignore them. For example, Applicants seek information from BNSF about how it sets rates for every single one of its routes, for each individual customer, over a multi-year time-period. See Applicants' RFP No. 23; see also, e.g., Applicants RFP No. 25 (seeking all documents relating to BNSF's strategy for pricing rail traffic); No. 26 (seeking all documents relating to BNSF's strategies for growing its rail traffic); No. 28 (seeking "all Documents and Communications relating to instances in which You made offers (such as bids on Request for Proposals) to customers opening new facilities that could be served by a rail carrier"). BNSF explained its relevance and proportionality objections to those requests (and others) in its responses and objections 21 days ago, but UP has not responded to any of those objections. Will UP be doing so, and if so, when?

**Third**, there is, in fact, a dispute whether some of the documents and information that UP seeks from BNSF are fairly subject to discovery. We note that others have repeatedly asked UP for authority to support its contention that UP and non-Applicant railroads are similarly situated as to all aspects of discovery. UP has never provided it, and there's not a single citation in UP's letter. Simply stated, there is not 1:1 reciprocity between BNSF and UP as to discovery in this proceeding. UP elected to enter into a merger and file a control application in which UP (not BNSF) bears the burden of proof. Further, UP elected to make hundreds of fact-based contentions in its application about the merits of its merger proposal, and BNSF is entitled to test those. UP's choices do not open BNSF up to 1:1 reciprocal discovery. BNSF and the other non-Applicant railroads are differently situated than UP and NS, and the discovery considerations are different.

**Fourth**, UP claims that for an unidentified set of its requests, BNSF must conduct custodial searches. UP does not identify which requests that UP believes require custodial searches or explain why custodial searches are necessary for those particular requests. What is your request-specific position?

We hope you will provide that information and responses in writing before our discussion. And which specific requests would you like to discuss? I am free most of Wednesday afternoon and before 11 AM ET on Thursday.

Thanks,

McClain

**McClain Thompson**

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**Subject:** FD 36873 - Applicants' 2nd Set of Discovery Requests

Counsel,

Please see the attached correspondence.

Best,

Kevin

**Kevin Kelly**

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