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General Committee of Adjustment
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Grand Trunk Western Railroad



245871

June 05, 2018

Ms. Cynthia Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423-0001

ENTERED
Office of Proceedings
June 5, 2018
Part of
Public Record

ELECTRONICALLY FILED

BEFORE THE SURFACE TRANSPORTATION BOARD

In the Matter of:

STB Finance Docket No. 36179

PROTEST, OF THE BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND
TRAINMEN, IN OPPOSITION TO APPLICATION

2ND ADDENDUM TO PETITION TO STAY

Dear Ms. Brown:

As you know, you wrote a letter on May 25, 2018, concerning FD 36179. On the second page of

your letter, you state as follows: **“If the verified notice contains false or misleading information, the exemption is void ab ignition.”** In this regard, yesterday (June 04, 2018), we submitted an Addendum, wherein we point out, in a gentlemanly and business-like manner, bad information, which we believe is included in the exemption requested by LSRC, which we believe is our legal right to bring such discrepancy to your attention, and for you to decide upon it, as you please, per your letter we of May 25, 2018.

However, in reply, the LSRC legal team, now sends you a letter, dated as June 4, 2018, wherein the LSRC legal team, attacks this GCA, on an STB provided government website no less, through their use of childish name calling against us, by using language against us, calling us the following names, as contained in their half-page letter, because we challenged their accuracy, calling us names, such as, but limited to: **“confused,” “ignorance” and “credibility”**.

Ms. Brown, this is completely unacceptable, calling us names on a government provided website, or anywhere else for that matter. All we did, was bring something to your attention and respectfully asked you to make your own decision, nothing more, nothing less, which is our legal right, per your letter. We didn’t call anybody any names, or insult anyone, or put anyone down. Yet, we get lambasted on your government website, by the lawyers for LSRC.

This is not a good way for them to defend themselves, in our opinion. Yes, they show a map and mileposts, but which one are we to believe? How do we know what is correct? Are we just supposed to guess, to assume, is that what this all boils down to, guessing games? And if you ask questions, they call you ignorant, confused and whatever? And for all we know, the map and mileposts could also be incorrect, i.e., in our opinion, ***if it’s not all correct, then it’s not correct at all.***

They’re the ones who are supposed to be specific in their purchase description. They’re the ones making the application, not us. They’re the ones buying the track, not us. Don’t they know what they’re buying! We have the right to know exactly where everything is. We’re just trying to figure out what they’re trying to do. You can’t just say, I’m wrong over here, but I was really correct over there. Or, look over here, but don’t look over there. We have the right to critique the application, and if we see a mistake, we have the legal right to bring it to your attention, which we did. They made a mistake, they don’t want to admit it, but instead, they want to distract, by calling us names, as being **non-credible, ignorant, confused** and you name it. In our opinion, ***if it’s not all correct,***

then it's not correct at all.

They say they want to purchase the "PH Track," but there is no such track. One bad apple, spoils the bunch, i.e., the concept being as follows: **if LSRC is not credible on one thing, then it undermines its credibility on the other things.**

Name calling, is not a defense, and will get people no-where. We continue to ask the Board to rule in favor of our Petition For Stay. However, as stated in our Addendum of June 3, 2018, if you believe LSRC has provided any false and/or misleading information to the Parties, or if not, we respect the STB either way, and it will make whatever decision it decides to make, either way.

Respectfully submitted,

Sincerely,

J. M. Karakian



General Chairman, BLET / GTW / GCA

C. c: "All Parties of Record" via UPS Delivery

Also, C. c. via email: Mr. Steve Napierkowski / Manager, Labor Relations, GTW
Mr. Dennis Pierce / National President, BLET
Mr. Gil Gore / Assigned Vice President, BLET
Mr. John Tolman / Vice President & National Legislative Representative, BLET
Mr. Brant Trumble / Legislative Director, State of Michigan, BLET
All BLET/GTW Local Chairmen