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**ENTERED
Office of Proceedings
November 22, 2016
Part of
Public Record**

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November 22, 2016

VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20024

Re: New England Central Railroad, Inc. -
Trackage Rights Order - Pan Am Southern LLC
STB Docket No. FD 35842

Dear Ms. Brown:

On November 4, 2016, New England Central Railroad, Inc. ("NECR") filed a Motion to Compel Pan Am Southern LLC ("PAS") to Produce Additional Discovery Responses ("Motion"). As a result of further discussions between the parties, and the production of additional responses by PAS, NECR is hereby withdrawing the Motion. NECR is advising Judge Glazer of the withdrawal of the Motion by copy of this letter.

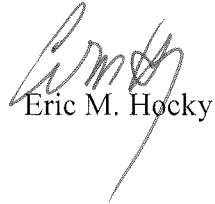
Further, the parties agree, and hereby jointly report to the Board that all discovery disputes have been resolved and that discovery is complete. Accordingly, under the procedural schedule approved by the Board, NECR's Rebuttal Evidence and Argument is due by Monday, January 23, 2017.

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Please let us know if you have any questions.

Respectfully,

CLARK HILL PLC



Eric M. Hocky

EMH/e

cc: Judge Steven A. Glazer
William A. Mullins
All parties shown on the attached Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing letter to the Board on behalf of New England
Central Railroad, Inc. was served on this date by the method indicated below:

By email on:

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By US first class mail, postage pre-paid on:

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Eric M. Hocky

Dated: November 22, 2016