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Law Offices of
VUONO & GRAY, LLC
2310 Grant Building
Pittsburgh, PA 15219
(412) 471-1800

Part of
Public Record
Richard R. Wilson
of Counsel

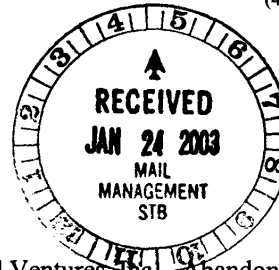
John A. Vuono
William A. Gray
Mark T. Vuono*
Dennis J. Kusturiss
Christine M. Dolfi
Louise R. Schrage
*Also Admitted in Florida

207/08

Facsimile
(412) 471-4477

January 23, 2003

VIA FEDERAL EXPRESS
Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001



Re: Docket No: AB-556 (Sub No 2X); Railroad Ventures, Inc. - Abandonment
Exemption - Between Youngstown, OH and Darlington, PA in Mahoning and
Columbiana Counties, OH and Beaver County, PA and

Dear Mr. Williams:

Enclosed for filing please find a Request for Extension filed on behalf of Railroad Ventures, Inc. ("RVI") in the above captioned proceeding seeking a thirty day extension of time until March 14, 2003, within which to respond to the Joint Motion seeking Final Closure of Escrow Account filed January 21, 2003 by Columbiana County Port Authority/Central Columbiana and Pennsylvania Railroad Company.

Copies of this Request for Extension have been served on all parties of record. Please date stamp and return to the undersigned the additional copy of this transmittal letter in the self addressed, stamped envelope provided for that purpose.

Very truly yours,

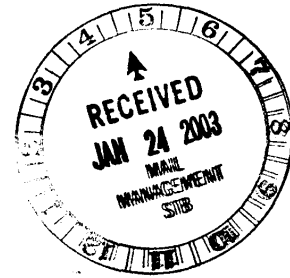
VUONO & GRAY, LLC

Richard R. Wilson
Attorney for Railroad Ventures, Inc

RRW/klh
Enclosures

xc: Railroad Ventures, Inc.
All Parties of Record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



Docket No. AB-556 (Sub No. 2X)

**RAILROAD VENTURES, INC. - ABANDONMENT EXEMPTION
BETWEEN YOUNGSTOWN, OHIO AND DARLINGTON, PA
IN MAHONING AND COLUMBIANA COUNTIES, OHIO
AND BEAVER COUNTY, PA**

REQUEST FOR EXTENSION OF RESPONSE DATE

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Richard R. Wilson, Esq.
Attorney for Railroad Ventures, Inc.

VUONO & GRAY, L.L.C.
2310 Grant Building
Pittsburgh, PA 15219
(412) 471-1800

Date: January 23, 2003

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



Docket No. AB-556 (Sub No. 2X)

**RAILROAD VENTURES, INC. - ABANDONMENT EXEMPTION
BETWEEN YOUNGSTOWN, OHIO AND DARLINGTON, PA
IN MAHONING AND COLUMBIANA COUNTIES, OHIO
AND BEAVER COUNTY, PA**

REQUEST FOR EXTENSION OF RESPONSE DATE

From April 22, 2002 to January 8, 2003 Railroad Ventures, Inc. ("RVI") has sought information from Columbiana County Port Authority ("CCPA") and Central Columbiana and Pennsylvania Railroad Company ("CCPR") regarding expenditures made by those parties from the escrow account maintained by CCPA under orders of the Surface Transportation Board ("STB") dated October 3, 2000 and November 8, 2001. On September 23, 2002, CCPA/CCPR provided RVI with limited documentation that did not identify the expenses billed and the work performed at each crossing and was incomplete and/or illegible. Nor did CCPA/CCPR provide information or documentation regarding the scope of the work for each project, the bid notices for each project or copies of the bids received for each project. RVI's letter of November 14, 2002 to CCPA/CCPR outlined in substantial detail the information and documents sought by RVI in order to evaluate escrow account expenditures.

On January 21, 2003, five months after the August 21, 2002 escrow fund termination date and four months after its initial document production, CCPA/CCPR filed a "Joint Motion

Seeking Final Closure of Escrow Account" which purports to account for CCPA/CCPR's use of escrow funds under the STB's orders. The January 22, 2003 filing notes that additional documentation is to be provided in a supplemental filing on January 23, 2003.

Under the Board's Rules of Procedure, §1104.13(a) provides that:

A party may file a reply or a motion addressed to any pleading within twenty days after that pleading is filed with the Board.

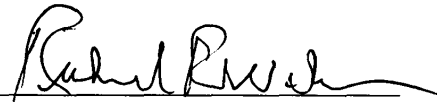
This rule requires that RVI file a response to the CCPA/CCPR Joint Motion no later than February 11, 2003. Clearly, there has been a significant delay by CCPA/CCPR in producing information and documentation regarding escrow account expenditures. Now that this information has been produced, it raises substantial questions regarding the compliance of CCPA/CCPR with the STB's orders and whether CCPA/CCPR improperly used escrowed funds for unauthorized purposes. Given the gravity of these questions as well as the volume and aggregated format of the expense data submitted by CCPA/CCPR, the twenty day response period under Section 1104.13(a) does not provide sufficient time for RVI to have this material carefully and thoroughly evaluated by its experts. Nor does the twenty day period afford adequate time to determine whether additional discovery may be necessary or to prepare and submit to the Board an appropriate response to the Joint Motion.

In addition, RVI's counsel is scheduled for three days of contested administrative hearings during the first week of March on behalf of another client which will require extensive prehearing preparations and client consultation in February. In view of these scheduling considerations, counsel for CCPA/CCPR have advised that they do not object to the requested extension.

Accordingly, it is respectfully requested that the Board grant RVI a thirty day extension of time until March 14, 2003 within which to file a response to the CCPA/CCPR Motion.

Respectfully submitted,

VUONO & GRAY, L.L.C.

By: 
Richard R. Wilson
Attorney for Railroad Ventures, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of January, 2003 served a copy of the Request for Extension of Response upon the following by First Class United States Mail, postage prepaid:

Keith G. O'Brien, Esq.
Rea, Cross & Auchincloss
Suite 570 Suite 420
1707 L Street, N.W.
Washington, D.C. 20036

Richard H. Streeter, Esq.
Barnes & Thornburg
750 17th Street, N.W.
Suite 900
Washington, DC 20006

A handwritten signature in black ink, appearing to read "Richard R. Wilson", with a long horizontal flourish extending to the right.

Richard R. Wilson
Attorney for Railroad Ventures, Inc.