

BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET No. 35116

222606

R.J. CORMAN RAILROAD COMPANY/PENNSYLVANIA LINES INC. – CONSTRUCTION
AND OPERATION EXEMPTION – CLEARFIELD COUNTY, PA

FINANCE DOCKET No. 35143

222607

R.J. CORMAN RAILROAD COMPANY/PENNSYLVANIA LINES INC. – ACQUISITION
AND OPERATION EXEMPTION – LINE OF NORFOLK SOUTHERN RAILWAY
COMPANY

DOCKET NO. AB 167 (SUB-NO. 1004N)

222608

CONRAIL ABANDONMENT OF THE SNOW SHOE INDUSTRIAL TRACK IN CENTRE
AND CLEARFIELD COUNTIES, PENNSYLVANIA

PETITION FOR LEAVE TO LATE FILE

Kathryn H.S. Pett
Bart W. Simmons
Ballard Spahr Andrews & Ingersoll, LLP
201 South Main Street, Suite 800
Salt Lake City, Utah 84111
(801) 531-3000

ATTORNEYS FOR PEOPLE PROTECTING
COMMUNITIES

Dated: June 13, 2008

Before the
Surface Transportation Board

Finance Docket No. 35116 - R.J.
CORMAN RAILROAD COMPANY/PENNSYLVANIA LINES INC. –
CONSTRUCTION AND OPERATION EXEMPTION –
CLEARFIELD COUNTY, PA

Finance Docket No. 35143 - R.J.
CORMAN RAILROAD COMPANY/PENNSYLVANIA LINES INC –
ACQUISITION AND OPERATION EXEMPTION –
LINE OF NORFOLK SOUTHERN RAILWAY COMPANY

Docket No. AB 167 (Sub-No. 1004N)
CONRAIL ABANDONMENT OF THE SNOW SHOE
INDUSTRIAL TRACK IN CENTRE AND
CLEARFIELD COUNTIES, PENNSYLVANIA

PETITION FOR LEAVE TO LATE FILE

People Protecting Communities, by undersigned counsel, respectfully request leave to late file its **Petition to Hold Proceedings in Abeyance and Declaration of Joanne Gillette, in Reply to the Motion to Partially Dismiss Petition for Exemption (Docket No. FD 35116) and Petition to Partially Vacate Certificate of Interim Trail Use or Abandonment (Docket No. AB-167 (Sub-No 1004N)).** In support of this motion Petitioner submits that it retained counsel for the purpose of reviewing this proceeding on Monday, June 9 and such additional time has been necessary for counsel to review the record and prepare this Petition and Declaration. Petitioner further submits that allowing the late filing will benefit the Board by providing a more complete record of the status of the permitting of the landfill project underlying

the matters referenced above and will not prejudice Corman Railroad Company/Pennsylvania Lines Inc.

WHEREFORE, and in view of the foregoing, People Protecting Communities respectfully request this Board to grant leave to late file its Petition to Hold Proceedings in Abeyance and Declaration of Joanne Gillette.

Dated: June 13, 2008

Respectfully submitted,


Kathryn H. S. Pett
Ballard Spahr Andrews & Ingersoll LLP
201 S Main Street, Suite 800
Salt Lake City, UT 84111
(801) 517-6805
pettk@ballardspahr.com
Counsel for People Protecting Communities

CERTIFICATE OF SERVICE

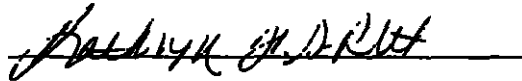
I hereby certify that on this 13th day of June 2008, copies of the foregoing Petition for Leave to Late File have been served by first class mail, postage prepaid, upon:

Richard R. Wilson
Richard R. Wilson, P C.
127 Lexington Avenue, Suite 100
Altoona, PA 16601
Attorney for Resource Recovery, LLC

John V. Edwards
Norfolk Southern Corporation
Three Commercial Place
Norfolk, VA 23510-2191

Ms. Jodi Brennan
Secretary
Headwaters Charitable Trust
478 Jeffers Street
DuBois, PA 15801

Ronald A. Lane
Fletcher & Sippel LLC
29 North Wacker Drive
Suite 920
Chicago, IL 60606-2832

A handwritten signature in black ink, appearing to read "Richard R. Wilson", is written over a horizontal line.