

**COPY**

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

**RECEIVED**  
JAN 22 2001

Illinois Commerce Commission  
RAIL SAFETY SECTION

City of Belleville, Illinois, a Municipal Corporation,

Petitioner,

v.

Norfolk Southern Railway Company and Illinois  
Department of Transportation,

Respondents.

Petition for an Order authorizing (a) the construction of  
a new at grade crossing of the 57<sup>th</sup> - 59<sup>th</sup> Street Connector  
with the tracks of the Norfolk Southern Railway Company  
in Belleville, St. Clair County, Illinois and directing the  
installation of automatic protection, and granting related  
relief, (b) the retention of the existing at grade crossing and  
automatic protection at South 59<sup>th</sup> Street, and (c) the  
closure of the existing at grade crossing at North 24<sup>th</sup>  
Street.

Docket No. T00-0111

**REQUEST FOR INFORMATION**

NOW COMES Respondent, NORFOLK SOUTHERN RAILWAY COMPANY, by its  
attorney, Neil F. Flynn, and pursuant to 92 Ill. Adm. Code Part 200, hereby requests that the  
Petitioner, CITY OF BELLEVILLE, produce and permit Respondent to inspect and copy each of  
the following materials and documents within twenty-one (21) days after service hereof. It is  
requested that you comply with this Request For Information by forwarding legible copies of such  
documents to the office of the undersigned attorney for Respondent.

**Documents To Be Produced**

1. A copy of any traffic count in the possession of the City of Belleville in relation to  
the subject crossings and subject intersections;

DOCKET

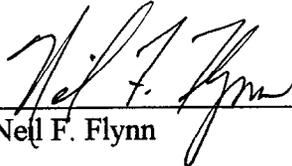
2. A list of all persons which the City of Belleville intends to call as witnesses at any hearing in this case;

3. A copy of any and all documents, pictures, sketches, drawings, measurements, and videos which the City of Belleville intends to offer as exhibits at any hearing in this case;

4. A copy of any written report from any experts, employees, agents or consultants used by the City of Belleville for reference or consultation or who will or may be called to testify at any hearing in this case; and

6. A copy of the curriculum vitae of any experts used by the City of Belleville for consultation or who will or may be called to testify at any hearing in this case.

NORFOLK SOUTHERN RAILWAY  
COMPANY, Respondent

  
\_\_\_\_\_  
Neil F. Flynn

Date: January 17, 2001

Neil F. Flynn  
Attorney at Law  
1035 South Second Street  
P.O. Box 37  
Springfield, Illinois 62705  
Tel.: 217-544-0261  
Fax: 217-544-0688

**PROOF OF SERVICE**

The undersigned certifies that on JANUARY 19, 2001, a copy of the foregoing Request For Information; Motion To Dismiss; and Motion To Dismiss For Failure To Join Necessary Party and Failure to Plead Necessary Facts were served upon the following parties by depositing said instruments in the U.S. Mail, with postage thereon fully prepaid, at Springfield, Illinois, plainly addressed as follows:

Kevin Sharpe, Director of Processing  
Illinois Commerce Commission  
527 East Capitol  
P.O. Box 19280  
Springfield, IL 62794-9280

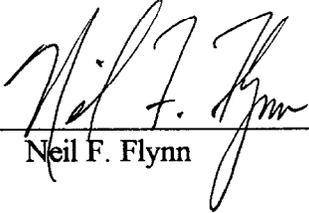
Mr. Bob Berry  
Railroad Staff  
Illinois Commerce Commission  
527 East Capitol  
Springfield, IL 62701

Mr. James C. Slifer, Director  
Division of Highways  
Illinois Department of Transportation  
2300 South Dirksen Parkway  
Springfield, IL 62764

Robert J. Sprague  
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Sprague & Urban  
26 East Washington Street  
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City of Belleville  
Mayor Mark A. Kern  
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