

ORIGINAL

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

RECEIVED

JAN 3 2008

Illinois Commerce Commission
RAIL SAFETY SECTION

T00-0113

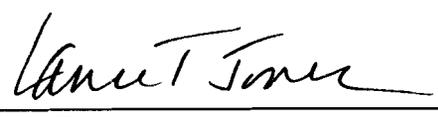
County of Jefferson,)
)
 Petitioner,)
)
 vs.)
)
 Union Pacific Railroad Company and The State of Illinois, Illinois)
 Department of Transportation,)
)
 Respondents.)
)
 Petition for an Order directing the construction of a grade separation)
 structure, other associated drainage structures, approach roadways,)
 and the removal of an existing at grade crossing and adjacent timber)
 highway bridge structure where TR 227 (Green Road) now crosses)
 the tracks of the Union Pacific Railroad in the central part of)
 Jefferson County near the City of Mt. Vernon and apportioning the)
 project cost among the parties.)

RESPONSE TO MOTION FOR CONTINUANCE

NOW COMES the Illinois Department of Transportation ("Department"), by and through its attorney Lance T. Jones, and in response to the County of Jefferson's letter requesting a continuance states as follows:

The Illinois Department of Transportation does not object to the Illinois Commerce Commission granting the Motion, without hearing, authorizing the continuance for the above referenced project.

Respectfully submitted,
ILLINOIS DEPARTMENT OF TRANSPORTATION



Lance T. Jones
Special Assistant Attorney General

Dated January 2, 2008

Illinois Department of Transportation
2300 South Dirksen Parkway, Room 311
Springfield, Illinois 62764
Telephone (217) 782-3215

DOCKETED

JAN - 4 2008

BV JOB

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

County of Jefferson,)
)
Petitioner,)
)
vs.) T00-0113
)
Union Pacific Railroad Company and The State of Illinois, Illinois)
Department of Transportation,)
)
Respondents.)
)
Petition for an Order directing the construction of a grade separation)
structure, other associated drainage structures, approach roadways,)
and the removal of an existing at grade crossing and adjacent timber)
highway bridge structure where TR 227 (Green Road) now crosses)
the tracks of the Union Pacific Railroad in the central part of)
Jefferson County near the City of Mt. Vernon and apportioning the)
project cost among the parties.)

CERTIFICATE OF SERVICE

I, JOHN W. JONES, an attorney, certify that I served a true and correct copy of the foregoing RESPONSE TO MOTION FOR CONTINUANCE upon the Respondents made parties to this proceeding via first class mail, postage prepaid, and depositing the same in the United States Mail, Springfield, this 2nd day January, 2008 addressed as follows:

Mr. Gary Duncan
Jefferson County State's Attorney
100 South 10th Street, Room 203
Mt. Vernon, IL 62864

Mr. Terry Moore
Mt. Vernon Township Highway
Commissioner
17505 North Hails Lane
Mt. Vernon, IL 62864

Mr. Gary Hahn
Rhutasel & Associates, Inc.
201 South Locust Street
Centralia, IL 62801-3508

Roy P. Farwell
100 North Broadway, Suite 1500
St. Louis, MO 63102

Office of the Mayor
City of Mt. Vernon
1100 Main City Hall
Mt. Vernon, IL 62864

Mr. Steve Schnake
Jefferson Co. Highway Engineer
750 Old Fairfield Road
Mt. Vernon, IL 62864

Office of the City Clerk
City of Mt. Vernon
1100 Main City Hall
Mt. Vernon, IL 62864

Mr. Troy Parrish
Parrish & Ringel
1015 Broadway, P.O. Box 1726
Mt. Vernon, IL 62864

John W. Jones
John W. Jones

Subscribed and sworn/affirmed to before me this 2nd day of January, 2008.

Lisa A. Brown
Notary Public, Illinois

