

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

UNION PACIFIC RAILROAD COMPANY,)
)
Petitioner,)

v.)

T14-0139

ILLINOIS DEPARTMENT OF TRANSPORTATION, GRUNDY)
COUNTY, WILL COUNTY, VILLAGE OF BRACEVILLE, VILLAGE)
OF GODLEY, and CITY OF BRAIDWOOD, ILLINOIS,)
)
Respondents.)

Petition for an Order of the Illinois Commerce Commission)
authorizing modification and reconfiguration of the grade crossing)
warning devices, crossing surfaces and approaches required for)
the installation of an additional railroad track at (1) the grade)
crossing inventoried as DOT #290514D (M.P. 61.26) at what is)
commonly known as Mitchell Road and under the jurisdiction of)
Grundy County, Illinois (the "Mitchell Road Grade Crossing"),)
(2) the grade crossing inventoried as DOT #290513W (M.P. 61.08))
at what is commonly known as Main Street and under the)
jurisdiction of the Village of Braceville, Grundy County, Illinois,)
(the "Braceville Main Street Grade Crossing"), (3) the grade)
crossing inventoried as DOT #290509G (M.P. 59.84) at what is)
commonly known as North Kankakee Street and under the)
jurisdiction of the Village of Godley, Will County, Illinois)
(the "North Kankakee Street Grade Crossing"), (4) DOT #290508A)
(M.P. 58.41) at what is commonly known as Division Street and)
under the jurisdiction of the City of Braidwood, Will County, Illinois)
(the "Division Street Grade Crossing"), (5) DOT #290507T)
(M.P. 57.71) at which is commonly known as Center Street and)
under the jurisdiction of the City of Braidwood, Will County, Illinois)
(the "Center Street Grade Crossing") and (6) DOT #290506L at)
(M.P. 57.31) at what is commonly known as Main Street in Will)
County, Illinois and under the jurisdiction of the Illinois Department)
of Transportation (the "Main Street Grade Crossing") the first two)
grade crossings being located in Grundy County, Illinois, and the)
next four grade crossings being located in Will County at their)
respective intersection with the main line track of Union Pacific)
Railroad Company, on the Joliet Subdivision.)

NOTICE OF FILING

TO: Mr. David Lazarides
Director of Processing
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

PLEASE TAKE NOTICE that on February 17, 2015, I filed via U.S. Mail, postage prepaid, with the Illinois Commerce Commission, the attached Motion to Continue, a copy of which is hereby served upon you.

Respectfully submitted,

UNION PACIFIC RAILROAD COMPANY



Mack H. Shumate, Jr.
Senior General Attorney

Mack H. Shumate, Jr., #2595532
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mackshumate@up.com

CERTIFICATE OF SERVICE

I, Mack H. Shumate, Jr., an attorney, hereby certify that on the 17th day of February, 2015, I caused the foregoing NOTICE OF FILING to be served on attorneys/parties of record by e-filing the same with the Illinois Commerce Commission and by forwarding the same to the following at the email addresses listed below, before 5:00 p.m.

John Saladino, Rail Safety Specialist
Railroad Section
Illinois Commerce Commission
527 East Capitol Avenue
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jsaladino@icc.illinois.gov

Omer Osman, Director of Highways
Illinois Department of Transportation
Attention: Jason Johnson
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Bruce D. Gould
Will County Highway Engineer
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Junior W. Zilm, Mayor
Village of Braceville
P.O. Box 187
Braceville, IL 60407

Brian Haars, Village President
Village of Godley
P.O. Box 89
Braceville, IL 60407

Sue A. Grygiel, Mayor
City of Braidwood
141 West Main Street
Braidwood, IL 60408



Mack H. Shumate, Jr.

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MOTION TO CONTINUE

NOW COMES the Union Pacific Railroad Company (“the Union Pacific”), through its attorney, Mack H. Shumate, Jr., with its Motion to Continue the hearing scheduled for March 17, 2015 at 10:00 a.m., and in support thereof, states as follows:

1. The Union Pacific is seeking an order from the Illinois Commerce Commission (“ICC”) authorizing the modification and reconfiguration of the grade crossing warning devices, crossing surfaces and approaches required for the installation of an additional railroad track at the grade crossings referenced above to promote public safety and convenience in conjunction with the Illinois High Speed Rail Program.

2. This matter is now set for hearing on March 17, 2015 at 1000 a.m. before the Honorable Latrice Kirkland-Montaque, Administrative Law Judge.

3. John N. Venice and Richard Ellison, both of the Union Pacific engineering department, and witnesses in this case, have a scheduling conflict and will be out of the State of Illinois and in Omaha for the Union Pacific Engineering Regional Staff Meeting on March 17, 2015.

4. The Staff of the ICC concurs with the alternative date of March 24, 2015.

WHEREFORE, the Railroad respectfully requests that the Commission enter an order continuing this matter from March 17, 2015 to March 24, 2015.

Dated: February 17, 2015

UNION PACIFIC RAILROAD COMPANY



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Railroad Section
Illinois Commerce Commission
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Attention: Jason Johnson
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Will County Highway Engineer
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