

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

UNION PACIFIC RAILROAD COMPANY,)	
)	
Petitioner,)	
)	
v.)	T14-0140
)	
ILLINOIS DEPARTMENT OF TRANSPORTATION, WILL)	
COUNTY, and WILMINGTON TOWNSHIP,)	
)	
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 #290502J at (M.P. 52.99) at what is)	
commonly known as North 1 st Street and under the jurisdiction of)	
Will County, Illinois (the "North 1 st Street Grade Crossing"), (2) the)	
grade crossing inventoried as DOT #290500V at (M.P. 52.54) at)	
what is commonly known as Kankakee Street/Township Road 44)	
and under the jurisdiction of the City of Wilmington, Will County,)	
Illinois, (the "Kankakee Street Grade Crossing"), (3) the grade)	
crossing inventoried as DOT #290498W at (M.P. 51.94) at what is)	
commonly known as East Kankakee River Drive/Township Road)	
106 and under the jurisdiction of the City of Wilmington,)	
Will County, Illinois (the "East Kankakee River Drive Grade)	
Crossing"), the grade crossings are all located in Will County,)	
Illinois, 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

A handwritten signature in black ink that reads "Mack H. Shumate, Jr." The signature is written in a cursive style with a large, prominent initial "M".

Mack H. Shumate, Jr.
Senior General Attorney

Mack H. Shumate, Jr., #2595532
Senior General Attorney
Union Pacific Railroad Company
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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
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
jsaladino@icc.illinois.gov

Omer Osman, Director of Highways
Illinois Department of Transportation
Attention: Jason Johnson
2300 South Dirksen Parkway, Room 205
Springfield, Illinois 62764
jason.johnson@illinois.gov

Michael Forti
Deputy Chief Counsel - IDOT
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Robert J. Lardi, Highway Commissioner
Wilmington Township Road District
29929 S. Kavanaugh Road
Wilmington, IL 60481



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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Mack H. Shumate, Jr.