

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Village of Elwood, Will County, Illinois,)	
Petitioner)	
)	
v.)	No. T01-0064
)	
Union Pacific Railroad Company and State of)	
Illinois, Department of Transportation,)	
Respondents)	
)	
Petition for an Order of the Illinois Commerce)	
Commission authorizing the establishment of a)	
new grade crossing at East Access Road with the)	
track of Union Pacific Railroad Company, in the)	
Village of Elwood, Will County, Illinois, directing)	
thereon the installation of automatic protection)	
devices and construction of the crossing proper)	
and dividing the cost among the parties, and)	
directing the closure of the existing grade crossing)	
at Chicago Avenue with the track of Union Pacific)	
Railroad in the Village of Elwood, Will County,)	
Illinois.)	

NOTICE OF FILING

TO: All Counsel of Record – See attached service list

PLEASE TAKE NOTICE THAT on April 20, 2015, we caused to be filed with the Illinois Commerce Commission this Notice of Filing of CenterPoint Intermodal LLC's Responses to the Village of Elwood's Request for Production, along with an accompanying Certificate of Service, copies of which are hereby served upon you.

DATED: April 20, 2015

By: /s/ Michael J. Scotti, III

Michael J. Scotti, III
Eric B. Powers
FREEBORN & PETERS LLP
311 South Wacker Drive, Suite 3000
Chicago, IL 60606

*Attorneys for Intervenor CenterPoint Intermodal
LLC*

CERTIFICATE OF SERVICE

I hereby certify that **CenterPoint Intermodal LLC's Notice of Filing of Responses to the Village of Elwood's Request for Production** was served upon all counsel of record listed on the attached Service List via email this 20th day of April, 2015.

/s/ Michael J. Scotti, III

Dated: April 20, 2015

SERVICE LIST

T01-0064

Claire E. Anderson, Engineer
Commuter Operations
Union Pacific Railroad
Two N. Riverside, Suite 1700
Chicago, IL 60606
ceanders@up.com

Jennifer Anderson
Office of Transportation Counsel
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601
janderso@icc.illinois.gov

Kevin P. Breslin
Richmond Breslin LLP
5215 Old Orchard Road, Suite 420
Skokie, IL 60077
kbreslin@RB-LLP.com

Michael Forti, Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Parkway
Springfield, IL 62764
michael.forti@illinois.gov

John Freise, Industry & Public Projects
Union Pacific Railroad Company
100 N. Broadway, Suite 1500
St. Louis, MO 63102
hjfreise@up.com

Bruce D. Gould
Will County Highway Engineer
16841 W. Laraway Road
Joliet, IL 60433
bgould@willcountyillinois.com

Omer Osman
Director of Highways – IDOT
Attn: Jason Johnson
2300 S. Dirksen Parkway
Springfield, IL 62764
jason.johnson@illinois.gov

Lawrence D. Parrish
Assistant Chief Counsel
Illinois Department of Transportation
100 W. Randolph, Suite 6-600
Chicago, IL 60601
lawrence.parrish@illinois.gov

Daniel Powers
Transportation – Railroad
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
dpowers@icc.illinois.gov

David R. Schmidt
MacCabe & McGuire
77 W. Wacker Drive, Suite 3333
Chicago, IL 60601
dschmidt@maccabe-mcguire.com

Mack H. Shumate Jr.
Attorney for Union Pacific Railroad Company
101 N. Wacker Drive, Suite 1920
Chicago, IL 60606
mackshumate@up.com

Paul D. Streicher
Attorney for the Village of Elwood
Rock Fusco & Connelly LLC
321 N. Clark Street, Suite 2200
Chicago, IL 60654
pstreicher@rockfuscoconnelly.com

Jennifer R. Kuntz
Office of Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Parkway, Room 313
Springfield, IL 62764
jennifer.kuntz@illinois.gov

Brian A. Vercruysse, Rail Safety Specialist
Railroad Section
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
bvercruy@icc.illinois.gov

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Village of Elwood, Will County, Illinois,)	
Petitioner)	
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v.)	
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Union Pacific Railroad Company and)	No. T01-0064
State of Illinois, Department of)	
Transportation,)	
Respondents)	
)	
Petition for an Order of the Illinois)	
Commerce Commission authorizing the)	
establishment of a new grade crossing at)	
East Access Road with the track of Union)	
Pacific Railroad Company, in the Village)	
of Elwood, Will County, Illinois,)	
directing thereon the installation of)	
automatic protection devices and)	
construction of the crossing proper and)	
dividing the cost among the parties, and)	
directing the closure of the existing grade)	
crossing at Chicago Avenue with the)	
track of Union Pacific Railroad in the)	
Village of Elwood, Will County, Illinois)	

**CENTERPOINT INTERMODAL LLC's RESPONSES TO
THE VILLAGE OF ELWOOD'S REQUEST FOR PRODUCTION**

NOW COMES CenterPoint Intermodal LLC ("CenterPoint"), by and through its attorneys, Freeborn & Peters LLP, and for its Responses to the Village of Elwood's Request for Production, states as follows:

REQUESTS FOR PRODUCTION

1. All documents supporting and/or relating in any way to the allegations in the CenterPoint Applications for Re-Hearing and Additional Hearing.

RESPONSE: CenterPoint objects to this request because (i) its Application for Additional Hearings was denied as moot; and (ii) its Application for Re-Hearing was denied on the merits.

2. All documents from CenterPoint and/or any organization affiliated with CenterPoint that were provided to IDOT or relied upon by John Fortmann and/or any other individual in the preparation of the IDOT December 23, 2014 correspondence to ALJ Kirkland-Montaque.

RESPONSE: CenterPoint objects to this request on the grounds that it would be pure speculation to guess as to what IDOT or John Fortmann “relied” upon in the preparation of their December 23, 2014 letter. Subject to that objection, CenterPoint has no documents responsive to this request.

3. All documents from CenterPoint and/or any organization affiliated with CenterPoint that were provided to IDOT and/or John Fortmann and/or any other individual in the preparation of the Verified Statement of John Fortmann.

RESPONSE: None known.

4. All email correspondence or any other record of communications by and between any employee or representative of CenterPoint, IDOT, John Fortmann, and/or any other individual referencing in any way the IDOT December 23, 2014 correspondence to ALJ Kirkland-Montaque, including the decision to file said correspondence with the ICC.

RESPONSE: None known.

5. All email correspondence or any other record of communications by and between any employee or representative of CenterPoint, IDOT and/or and John Fortmann referencing in any way the Verified Statement of John Fortmann.

RESPONSE: None known.

6. Any and all drafts of the IDOT December 23, 2014 correspondence to ALJ Kirkland-Montaque in the possession of CenterPoint.

RESPONSE: None. CenterPoint is only in possession of the executed letter as filed and is not in possession of any prior drafts.

CERTIFICATE OF SERVICE

I hereby certify that **CenterPoint Intermodal LLC's Responses to the Village of Elwood's Requests for Production** was served upon all counsel of record listed on the attached Service List via e-mail this 20th day of April, 2015.

/s/ Michael J. Scotti, III

Dated: April 20, 2015

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Claire E. Anderson, Engineer
Commuter Operations
Union Pacific Railroad
Two N. Riverside, Suite 1700
Chicago, IL 60606
ceanders@up.com

Jennifer Anderson
Office of Transportation Counsel
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601
janderso@icc.illinois.gov

Kevin P. Breslin
Richmond Breslin LLP
5215 Old Orchard Road, Suite 420
Skokie, IL 60077
kbreslin@RB-LLP.com

Michael Forti, Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Parkway
Springfield, IL 62764
michael.forti@illinois.gov

John Freise, Industry & Public Projects
Union Pacific Railroad Company
100 N. Broadway, Suite 1500
St. Louis, MO 63102
hjfreise@up.com

Bruce D. Gould
Will County Highway Engineer
16841 W. Laraway Road
Joliet, IL 60433
bgould@willcountyllinois.com

Omer Osman
Director of Highways – IDOT
Attn: Jason Johnson
2300 S. Dirksen Parkway
Springfield, IL 62764
jason.johnson@illinois.gov

Lawrence D. Parrish
Assistant Chief Counsel
Illinois Department of Transportation
100 W. Randolph, Suite 6-600
Chicago, IL 60601
lawrence.parrish@illinois.gov

Daniel Powers
Transportation – Railroad
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
dpowers@icc.illinois.gov

David R. Schmidt
MacCabe & McGuire
77 W. Wacker Drive, Suite 3333
Chicago, IL 60601
dschmidt@maccabe-mcguire.com

Mack H. Shumate Jr.
Attorney for Union Pacific Railroad Company
101 N. Wacker Drive, Suite 1920
Chicago, IL 60606
mackshumate@up.com

Paul D. Streicher
Attorney for the Village of Elwood
Rock Fusco & Connelly LLC
321 N. Clark Street, Suite 2200
Chicago, IL 60654
pstreicher@rockfuscoconnelly.com

Jennifer R. Kuntz
Office of Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Parkway, Room 313
Springfield, IL 62764
jennifer.kuntz@illinois.gov

Brian A. Vercruysse, Rail Safety Specialist
Railroad Section
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
bvercruy@icc.illinois.gov

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