

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

THE COUNTY OF KANE,)	
)	
Petitioner,)	
v.)	No. T14-0012
)	
THE UNION PACIFIC RAILROAD COMPANY,)	
and THE BLACKBERRY TOWNSHIP ROAD)	
DISTRICT,)	
Respondents.)	
)	
Petition seeking an order from the Illinois Commerce)	
Commission (1) authorizing the installation of wayside)	
horn systems at the Brundige Road and La Fox Road)	
grade crossings on the Union Pacific Railroad Company)	
main line tracks west of Geneva, in Kane County,)	
Illinois that permits only qualified application of Union)	
Pacific Railroad Company locomotive horns at each)	
grade crossing and (2) requiring the initial installation)	
costs be borne by the Petitioner, the County of Kane)	
and ongoing maintenance costs of the LaFox road)	
wayside horn system by borne by the Petitioner, the)	
County of Kane and the ongoing maintenance costs)	
of the Brundige Road wayside horn system be borne)	
by the Blackberry Township Road District.)	

REQUEST FOR EXTENSION OF TIME TO COMPLETE PROJECT

NOW COMES Petitioner, Union Pacific Railroad Company, a Delaware Corporation authorized to transact business as a foreign corporation in the State of Illinois (“Union Pacific”), by and through it attorney Mack H. Shumate, Jr., with a request for an extension of time until December 15, 2015 to complete the project covered by the Order of the Illinois Commerce Commission (“Commission”) dated August 13, 2014 in the above-captioned docket (the “Order”). Unless otherwise defined herein, capitalized terms used herein shall have the same meaning as defined in the Order.

The Order provides that the project shall be completed by August 13, 2015. Due to personnel changes in the Engineering Department Commuter Services Division one set of the two sets of electrical plans were not submitted to the Signal Design Department in Omaha, Nebraska for final design and approval. This oversight was corrected two week ago upon discovery. It is planned that the UP signal portion of the Project will be completed by September 15, 2015. However, to avoid further action by the ICC, Union Pacific is seeking an extension of the completion date to December 15, 2015 to cover any unforeseen issues or work for the Project.

WHEREFORE, The Petitioner, Union Pacific Railroad Company, respectfully requests

the following:

1. For the reasons outline above, Union Pacific Railroad Company requests an extension of time to complete the work covered by the Order in T14-0012 dated August 13, 2014 to December 15, 2015.
2. Such other or further relief as the Hearing Officer may deem appropriate.

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

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by the Blackberry Township Road District.)

NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have e-filed on July 29, 2015, Union Pacific Railroad Company's Notice of Filing with the Illinois Commerce Commission for a Request for Extension of Time in the above-captioned matter.



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CERTIFICATE OF SERVICE

The undersigned certifies that copies of the foregoing instruments were served upon the addresses listed below by U.S. Mail, or the email address provided this July 29, 2015.

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