STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Union Pacific Railroad Company, a Delaware Corporation, Petitioner, v. Village of Melrose Park, Illinois, a municipal Corporation in Cook County, Illinois, and the Illinois Department of Transportation, Respondent. Petition for an Order of the Illinois Commerce Commission for authorization to modify the existing (1) 19th Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR/DOT #174009S, railroad milepost 11.38), under the jurisdiction of the Illinois Department of Transportation and located in the Village of Melrose Park, Cook County, Illinois, on the Geneva Subdivision, to accommodate the installation of an additional railroad track at said 19th Avenue highway-rail grade crossings on said Geneva Subdivision, and authorizing the reconfiguration of the existing crossing surface, existing roadway surface and the existing warning devices.	:	T15-0161

Union Pacific Railroad Company, a Delaware Corporation, Petitioner, v. Village of Maywood, Illinois, a municipal Corporation in Cook County, Illinois, and the Illinois Department of Transportation, Respondent. Petition for an Order of the Illinois Commerce Commission for authorization to modify the existing (1) 1st Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR/DOT #173996K, railroad milepost 10.2), under the jurisdiction of the Illinois Department of Transportation and located in the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision, (2) 5th Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR/DOT #173998Y, railroad milepost 10.57), located in and under the	:	T15-0163

jurisdiction of the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision and (3) 9th Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR-DOT #174001M, railroad milepost 10.76), located in and under the jurisdiction of the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision to accommodate the installation of an additional railroad track at said 1st Avenue, 5th Avenue and 9th Avenue highway-rail grade crossings on said Geneva Subdivision, and authorizing the reconfiguration of the existing crossing surface, existing roadway surface and the existing warning devices.

UNION PACIFIC'S MOTION TO CONSOLIDATE AND AMEND PETITIONS

The Union Pacific Railroad Company ("UP") filed a petition with the Illinois Commerce Commission (the "Commission") in ICC Docket No. T15-0161 on December 16, 2015 seeking an Order from the Commission authorizing the modification of the existing 19th Avenue highway-rail grade crossing of the UP's tracks to accommodate the installation of an additional railroad track at said 19th Avenue highway – rail grade crossing and further authorizing the reconfiguration of the existing crossing surface, existing roadway surface and the existing warning devices. Subsequent to said filing it was learned that in addition to named respondents, Village of Melrose Park, Illinois, a municipal Corporation in Cook County, Illinois ("Melrose Park") and the Illinois Department of Transportation ("IDOT"), the Village of Maywood, Illinois, a municipal Corporation, Cook County, Illinois ("Maywood") also has jurisdiction over a portion of the 19th Avenue highway – rail grade crossing.

The UP also filed a petition with the Commission in ICC Docket No. T15-0163 on December 16, 2015 seeking Order from the Commission authorizing the modification of the existing 1st Avenue highway – rail grade crossing, the 5th Avenue highway – rail grade crossing, and the 9th Avenue highway – rail grade crossing of the UP's tracks to

accommodate the installation of an additional railroad track at said 1st Avenue highway – rail grade crossing, the 5th Avenue highway – rail grade crossing, and the 9th Avenue highway – rail grade crossing and further authorizing the reconfiguration of the existing crossing surface, existing roadway surface and the existing warning devices at the 1st Avenue highway – rail grade crossing, the 5th Avenue highway – rail grade crossing, and the 9th Avenue highway – rail grade crossing. Subsequent to said filing it was learned that in addition to named respondents, Village of Maywood, Illinois, a municipal corporation in Cook County, Illinois ("Maywood") and the Illinois Department of Transportation (IDOT), the Village of Melrose Park, Illinois a municipal corporation, Cook County, Illinois ("Melrose Park") also has partial jurisdiction of the 9th Avenue highway – rail grade crossing.

After consultation with the staff of the Commission, the attorney's for Maywood, Melrose Park and IDOT it was determined that it would be in the best interest of the Petitioner and all Respondents to consolidate T15-0161 and T15-0163 in that the overall Project is in the nature of a corridor project that touches and concerns all of the parties in both cases either directly or indirectly and that for purposes of efficiency, construction coordination and public safety it is in the best interest of all parties to consolidate T15-0161 and T15-0163.

WHEREFORE, the Union Pacific Railroad Company respectfully requests through this motion that is based on the facts stated above that the Illinois Commerce Commission enter an order consolidating the above referenced matters and to add as respondents (1) the Village of Maywood, a municipal corporation in T15-0161 in that the Village of Maywood has a jurisdiction interest over a portion of the 19th Avenue highway

– rail grade crossing and (2) the Village of Melrose Park, a municipal corporation in T15-0163 in that the Village of Melrose Park has a jurisdiction interest over a portion of the 9th Avenue highway – rail grade crossing.

Respectfully submitted,

UNION PACIFIC RAILROAD COMPANY,
Petitioner

Mack H. Shumate, Jr.
Senior General Attorney

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VERIFICATION

I, Sean D. Collier, Manager Field Engineering for the Petitioner, Union Pacific Railroad Company, hereby certify pursuant to 735 ILCS 5/1-109 that I have read the foregoing Petition and the matters contained therein are believed true and correct based upon the information provided to me and reasonable inquiry made with respect to same.

Sean D. Collier

Sean D. Collier

SUBSCRIBED AND SWORN TO
before me this 24th day of March, 2016

Evelis Velazquez

NOTARY PUBLIC

OFFICIAL SEAL
EVELIS VELAZQUEZ
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:10/09/17

CERTIFICATE OF SERVICE

I, Mack H. Shumate, Jr., an attorney, hereby certify that on the 16th day of December, 2015, I caused the foregoing **MOTION TO CONSOLIDATE AND AMEND PETITIONS** to be served on attorneys/parties of record by UPS 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.

Brian Vercruysse
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Village of Maywood
40 Madison Street
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Village of Melrose Park
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Mack H. Shumate, Jr.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Union Pacific Railroad Company, a Delaware Corporation, Petitioner, v. Village of Maywood, Illinois, a municipal Corporation in Cook County, Illinois, and the Illinois Department of Transportation, Respondent.	:	T15-0163
Petition for an Order of the Illinois Commerce Commission for authorization to modify the existing (1) 1st Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR/DOT #173996K, railroad milepost 10.2), under the jurisdiction of the Illinois Department of Transportation and located in the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision, (2) 5th Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR/DOT #173998Y, railroad milepost 10.57), located in and under the jurisdiction of the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision and (3) 9th Avenue highway-rail grade crossing of the Union Pacific Railroad Company's tracks (AAR-DOT #174001M, railroad milepost 10.76), located in and under the jurisdiction of the Village of Maywood, Cook County, Illinois, on the Geneva Subdivision to accommodate the installation of an additional railroad track at said 1st Avenue, 5th Avenue and 9th Avenue highway-rail grade crossings on said Geneva Subdivision, and authorizing the reconfiguration of the existing crossing surface, existing roadway surface and the existing warning devices.	:	

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 March 24, 2016, I filed via e-filing, with the Illinois Commerce Commission, the attached Notice of Filing, a copy of which is hereby served upon you.

Respectfully submitted,

UNION PACIFIC RAILROAD COMPANY

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Senior General Attorney

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CERTIFICATE OF SERVICE

I, Mack H. Shumate, Jr., an attorney, hereby certify that on the 24th day of March, 2016, I caused the foregoing **NOTICE OF FILING** to be served on attorneys/parties of record by UPS 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.

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