

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

A. EDWARD SCHWARTZ, :
 :
 Complainant, : Docket No. C-2016-2570929
 :
 v. :
 :
 NORFOLK SOUTHERN RAILWAY CO., :
 PENNSYLVANIA DEPARTMENT OF :
 TRANSPORTATION, LACKAWANNA :
 COUNTY and LAPLUME TOWNSHIP :
 : FILED ELECTRONICALLY
 Respondents. :

**NOTICE OF JOINDER IN NORFOLK SOUTHERN RAILWAY
COMPANY'S ANSWER TO A. EDWARD SCHWARTZ'S MOTION FOR
SUMMARY JUDGMENT AND TO THE DEPARTMENT OF
TRANSPORTATION'S ANSWER TO THE MOTION FOR SUMMARY
JUDGMENT AS TO PUC JURISDICTION OVER APPLICATION FOR DAMAGES
SUSTAINED DUE TO ABOLITION OF RAILROAD CROSSING**

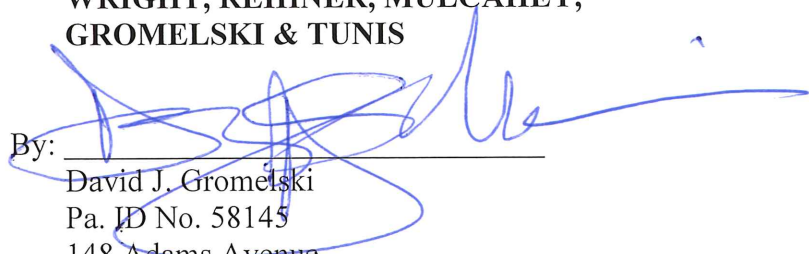
TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Respondent, LaPlume Township, hereby joins, without limitation, in Norfolk Southern Railway Company's Answer to A. Edward Schwartz's Motion for Summary Judgment and to the Department of Transportation's Answer to the Motion for Summary Judgment as to PUC Jurisdiction Over Application for Damages Sustained Due to Abolition of Railroad Crossing filed on April 7, 2017.

Respectfully submitted,

**WRIGHT, REIHNER, MULCAHEY,
GROMELSKI & TUNIS**

By: _____



David J. Gromelski
Pa. ID No. 58145
148 Adams Avenue
Scranton, PA 18503
(570) 961-1166
(570) 961-1199 – fax

Dated: April 7, 2017

Attorney for LaPlume Township

CERTIFICATE OF SERVICE

I, David J. Gromelski, hereby certify that I have caused to be served on this day, a true and correct copy of the foregoing Notice of Joinder in Norfolk Southern Railway Company's Answer to A. Edward Schwartz's Motion for Summary Judgment and to the Department of Transportation's Answer to the Motion for Summary Judgment as to PUC Jurisdiction Over Application for Damages Sustained Due to Abolition of Railroad Crossing upon counsel of record, via first class mail, addressed as follows:

Counsel for Complainant

Lawrence A. Ludwig, Esquire
238 Vassar Avenue
Clarks Green, PA 18411

Counsel for Pa DOT

Jennifer Brown-Sweeney, Esquire
Office of Chief Counsel
Pa Department of Transportation
P.O. Box 8212
Harrisburg, PA 17105-8212

Counsel for Norfolk Southern Railway

Benjamin C. Dunlap, Jr., Esquire
200 North Third Street – 18th Floor
P.O. Box 840
Harrisburg, PA 17108-0840

Counsel for Lackawanna County

Donald J. Frederickson, Jr., Esquire
Lackawanna County General Counsel
200 Adams Avenue – 6th Floor
Scranton, PA 18503



David J. Gromelski

Dated: April 7, 2017