



United States Steel Corporation
Law Department
600 Grant Street, Room 1500
Pittsburgh, PA 15219-2800
Tel: 412.433.2832
Fax: 412.433.2811
E-mail: sfreynoldsjr@uss.com

Samuel F. Reynolds, Jr.
Counsel - Litigation

February 13, 2020

Via Electronic Filing Only

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
2nd Floor
Harrisburg, PA 17120

Re: *Municipality of Penn Hills co Scott Andrejchak v Union Railroad Company et al.*
Docket No. **C-2019-3013809**

Dear Secretary Chiavetta:

Attached for electronic filing in the above-referenced proceeding is Union Railroad Company's Unopposed Motion for Additional Time to File Prehearing Motions and Petitions and a proposed Order, which I have served via email on Judge Dunderdale and counsel for all remaining parties.

Sincerely,

/s/ Samuel F. Reynolds, Jr.

Samuel F. Reynolds, Jr.

cc w/encl, via email:
Hon. Katrina L. Dunderdale
Craig H. Alexander, Esquire
Kayla L. Rost, Esquire, BIE

5. On January 14, 2020, Judge Dunderdale issued a First Interim Order which set a February 15, 2020 deadline for the filing of prehearing motions and petitions and dismissed all respondents but URR from the case.

6. The ownership and possession of the parcels, the inlet of the culvert and building, and the related rights and obligations of the parties, are outcome determinative of this case.

7. URR has searched for maps, drawings, deeds, leases and other agreements that will or should allow the parties to determine ownership, possession and the parties' related rights and obligations.

8. Despite its best efforts and due to the difficulty of searching for very old documents, in the public record and in URR's archives, URR has not been able to complete its search.

9. URR has also asked Penn Hills to reply to URR's new matter and produce the deed(s), lease(s) or other agreements by which Penn Hills possesses the parcel on which the inlet of the culvert is located.

10. Penn Hills has agreed to file a reply and search for the documents that URR has requested.

11. URR needs additional time to file prehearing motions or petitions, which URR believes will obviate the need for an in-person hearing on the merits.

12. Undersigned counsel has consulted Craig Alexander, counsel for Penn Hills, and Kayla L. Rost, the prosecutor for the Bureau of Investigation and Enforcement, and they do not oppose this motion.

13. A proposed Order is submitted herewith.

WHEREFORE, Union Railroad requests the Court to issue an Order allowing the parties 45 additional days in which to file prehearing motions or petitions, so that the deadline is reset for March 30, 2020.

Respectfully submitted,

Date: February 13, 2020

/s/ Samuel F. Reynolds, Jr.
SAMUEL F. REYNOLDS, JR., PA ID # 42215
Counsel-Litigation
United States Steel Corporation
600 Grant St., Suite 1500
Pittsburgh, PA 15219
Tel.: (412) 433-2832
Fax: (412) 433-2811
sfreynoldsjr@uss.com

Attorney for Union Railroad Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Municipality of Penn Hills c/o Scott Andrejchak	:	
	:	
v.	:	
	:	Docket No. C-2019-3013809
Union Railroad Company	:	
	:	

ORDER

Having considered respondent Union Railroad Company’s Unopposed Motion for Additional Time to File Prehearing Motions and Petitions,

IT IS ORDERED that the motion be and hereby is GRANTED and that the deadline for the filings of prehearing motions and petitions be and hereby is reset for March 30, 2020.

Date: February ____, 2020

Katrina L. Dunderdale
Administrative Law Judge

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Unopposed Motion for Additional Time to File Prehearing Motions and Petitions and accompanying proposed Order have been filed electronically and served on this 13th day of February 2020, via email, upon:

Hon. Katrina L. Dunderdale
Pennsylvania Public Utility Commission
Piatt Building, Ste 220
301 Fifth Avenue
Pittsburgh, PA 15222
kdunderdal@pa.gov

Craig H. Alexander, Esquire
Bruce E. Dice & Associates P.C.
787 Pine Valley Drive, Suite E
Pittsburgh, PA 15239
CAlexander@dicelaw.com

Kayla L. Rost, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
karost@pa.gov

/s/ Samuel F. Reynolds, Jr.

SAMUEL F. REYNOLDS, JR.
Attorney for Union Railroad Company