



**FANELLI, EVANS & PATEL, P.C.**

- ATTORNEYS -

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FREDERICK J. FANELLI

September 24, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg., 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

IN RE:           **Application of Blue Mountain  
Docket NO. A-2008-2016324**

Dear Ms. Chiavetta:

Enclosed please find a Motion to Withdraw as Counsel with respect to the above-captioned matter. Copies of this document have been served upon the parties as indicated on the enclosed certificate of service.

Very truly yours,

*Frederick J. Fanelli, Esq./s/*

FREDERICK J. FANELLI, ESQ.

FJF:jar  
Enclosure

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

In RE: Application of Blue Mountain : In Re: C-20078010  
For approval of the abolition of the crossing where : A-2008-2016324  
Township Route T-567 crosses at grade the tracks of :  
Reading, Blue Mountain & Northern Railroad Company :  
Located in Reilly Township, Schuylkill County :

**MOTION TO WITHDRAW AS COUNSEL**

1. The undersigned counsel received a Notice of Hearing in the above-captioned matter scheduled for November 12, 2020.
2. The undersigned counsel no longer represents Reading, Blue Mountain & Northern Railroad Company.
3. The undersigned counsel has notified his prior client Wayne Michel, the President of Reading, Blue Mountain & Northern Railroad Company, of the November 12, 2020 hearing and that he would need to forward to his new counsel.
4. If Reading, Blue Mountain & Northern Railroad Company has not retained new counsel to date, they have ample time prior to the November 12, 2020 hearing to do so.
5. The undersigned counsel is now retired and currently not in the Commonwealth of Pennsylvania.

WHEREFORE, the undersigned counsel requests this Motion to Withdraw as Counsel be granted.

Respectfully submitted by:

Frederick J. Fanelli /s/  
FREDERICK J. FANELLI, ESQUIRE  
Attorney I.D. #36672  
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The Necho Allen  
No. 1 Mahantongo Street  
Pottsville, PA 17901  
(570) 622-2455

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

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Located in Reilly Township, Schuylkill County :

**CERTIFICATE OF SERVICE**

This document will be served this 24<sup>th</sup> day of September via first-class mail to the following parties:

Benjamin Dunlap, Jr., Esquire  
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P. O. Box 8212  
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Schuylkill County Courthouse  
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Pottsville, PA 17901

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234 N. Sixth Street  
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Respectfully submitted by:

Frederick J. Fanelli /s/  
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Attorney I.D. #36672