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December 11, 2020

Honorable Joel H. Cheskis  
Deputy Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**RE: Blackwood, Inc. v. Reading, Blue Mountain and Northern Railroad Co.  
C-20078010, A-2008-2016324 – Status Update**

Judge Cheskis:

Please accept the following as a status update as discussed during the November 12, 2020 telephonic hearing in the above referenced matters. We have made attempts to contact counsel for Blackwood in accordance with your request during the telephonic hearing. Attorney Wilson, whose appearance is entered for Blackwood in the above referenced matters, is retired. My office reached out to Attorney Martin Cerullo who represents Blackwood in a related civil action before the Schuylkill County Court of Common Pleas, at docket number S-3238-2008. Mr. Cerullo advised that he would inform Blackwood of the recent activity in the above referenced matters and need for counsel's entry of appearance.

Accordingly, I respectfully request an additional two weeks' time to file a Motion to Dismiss on behalf of Reading, Blue Mountain and Northern Railroad. This should allow sufficient time for Blackwood to secure new counsel in the above referenced matters, and for us to engage in discussions regarding status, resolution, and/or Motions to Dismiss with Blackwood's counsel.

Please contact me if you have any questions.

Very truly yours,

*/s/Lawrence J. Moran*  
Lawrence J. Moran, Jr., Esq.

cc: Kayla Rost, Esq.  
Gina D'Alfonso, Esq.  
Benjamin Dunlap, Jr.  
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