

ROLF E. KROLL, ESQUIRE  
Pa. Supreme Court I.D. No. 47243  
MARGOLIS EDELSTEIN  
214 Senate Avenue, Suite 402  
Camp Hill, PA 17011  
Telephone: (717) 760-7502  
Facsimile: (717) 975-8124  
E-mail: [rkroll@margolisedelstein.com](mailto:rkroll@margolisedelstein.com)

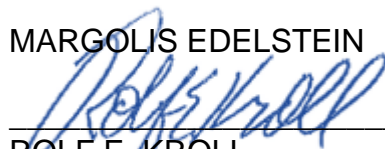
Counsel for Respondent,  
Derry Township

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION	
DAVID A. ROMANOSKI (pro se),  Complainant  v.  PENNSYLVANIA PUBLIC UTILITY COMMISSION, PENNSYLVANIA DEPARTMENT OF TRANSPORTATION, DERRY TOWNSHIP, DAUPHIN COUNTY, and NORFOLK SOUTHERN RAILWAY COMPANY,  Respondents	T-2023-3040729  VIA ELECTRONIC FILING
<b>RESPONDENT, DERRY TOWNSHIP'S MOTION TO JOIN IN ANSWER AND MOTION TO DISMISS</b>	

Respondent, Derry Township, hereby incorporates by reference and joins in the Answer and Motion to Dismiss filed by Respondent, Dauphin County, filed on or about October 18, 2023, as though set forth herein at length.

WHEREFORE, Respondent, Derry Township, respectfully requests that this Honorable Court enter an Order granting the Motion to Dismiss.

Date: October 24, 2023

By:   
\_\_\_\_\_  
ROLF E. KROLL  
Attorney I.D. No. 47243  
(Counsel for Respondent,  
Derry Township)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I served a true and correct copy of the foregoing on all counsel of record in the manner of transmission noted below on this 24th day of October, 2023, and addressed as follows:

David A. Romanoski  
243 S. Mill Road  
Hummelstown, PA 17036  
*Pro Se Plaintiff*

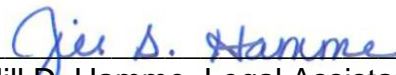
Jade M. Salyards, Assistant Counsel  
Commonwealth of Pennsylvania  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
via electronic mail transmission:  
[jasalyards@pa.gov](mailto:jasalyards@pa.gov)  
*Counsel for Defendant,  
Pennsylvania Department of  
Transportation*

Joseph P. Cardinale, Jr., Esquire  
Rhonda L. Daviston, Esquire  
Elizabeth H. Barnes, Esquire  
Commonwealth Keystone Building  
400 North St., 3<sup>rd</sup> Floor  
Harrisburg, PA 17120  
via electronic mail transmission:  
[jcardinale@pa.gov](mailto:jcardinale@pa.gov) / [rdaviston@pa.gov](mailto:rdaviston@pa.gov) /  
[ebarnes@pa.gov](mailto:ebarnes@pa.gov)  
*Counsel for Defendant,  
Pennsylvania Public Utility Commission*

Guy P. Beneventano, Esquire  
2 South Second Street  
P.O. Box 1295  
Harrisburg, PA 17101  
via electronic mail transmission:  
[guy@guyblaw.com](mailto:guy@guyblaw.com)  
*Counsel for Defendant,  
County of Dauphin*

Joshua D. Bonn, Esquire  
200 North Third Street, 18<sup>th</sup> Floor  
Harrisburg, PA 17101  
via electronic mail transmission:  
[jbonn@nssh.com](mailto:jbonn@nssh.com)  
*Counsel for Defendant,  
Norfolk Southern Railway*

MARGOLIS EDELSTEIN

By:   
Jill D. Hamme, Legal Assistant to  
Rolf E. Kroll, Esquire