



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

March 13, 2024

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Blackwood, Inc. v.  
Reading Blue Mountain and Northern Railroad Company  
Docket No. C-20078010

Application of Reading Blue Mountain and Northern Railroad Company for approval of the abolition of the crossing (AAR 592 007 F) where Township Route T-567 crosses at grade the tracks of Reading Blue Mountain and Northern Railroad Company, located in Reilly Township, Schuylkill County  
Docket No. A-2008-2016324

**Withdrawal and Entry of Appearance**

Dear Secretary Chiavetta:

Enclosed for electronic filing is the **Withdrawal and Entry of Appearance** of the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies have been served on the parties of record in accordance with the Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'mswindler' with a stylized flourish at the end.

Michael L. Swindler  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

MLS/ac  
Enclosure

cc: As per Certificate of Service  
William Sinick, P.E., C.B.S.I. (via email - [wilsinick@pa.gov](mailto:wilsinick@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                           |
|---|---|---------------------------|
| Blackwood, Inc.   | : |                           |
|   | : |                           |
| v.  | : | Docket No. C-20078010     |
|   | : |                           |
| Reading Blue Mountain and Northern Railroad<br>Company  | : |                           |
|   | : |                           |
|   | : |                           |
| Application of Reading Blue Mountain and<br>Northern Railroad Company for approval of<br>the abolition of the crossing (AAR 592 007 F)<br>where Township Route T-567 crosses at grade<br>the tracks of Reading Blue Mountain and<br>Northern Railroad Company, located in Reilly<br>Township, Schuylkill County | : | Docket No. A-2008-2016324 |

**WITHDRAWAL AND ENTRY OF APPEARANCE**

Please withdraw the appearance of Kayla L. Rost, Prosecutor, on behalf of the Bureau of Investigation and Enforcement, and enter the appearance of Michael L. Swindler, Deputy Chief Prosecutor, for the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-captioned proceeding.

A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Michael L. Swindler, Esq.  
[mwindler@pa.gov](mailto:mwindler@pa.gov)  
PA Attorney ID No. 43319  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 783-6369



Michael L. Swindler  
Deputy Chief Prosecutor  
PA Attorney ID No. 43319

Dated: March 13, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                           |
|---|---|---------------------------|
| Blackwood, Inc.   | : |                           |
|   | : |                           |
| v.  | : | Docket No. C-20078010     |
|   | : |                           |
| Reading Blue Mountain and Northern Railroad<br>Company  | : |                           |
|   | : |                           |
|   | : |                           |
| Application of Reading Blue Mountain and<br>Northern Railroad Company for approval of<br>the abolition of the crossing (AAR 592 007 F)<br>where Township Route T-567 crosses at grade<br>the tracks of Reading Blue Mountain and<br>Northern Railroad Company, located in Reilly<br>Township, Schuylkill County | : | Docket No. A-2008-2016324 |

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Withdrawal and Entry of Appearance** dated March 13, 2024, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Service by Electronic Mail:**

Honorable F. Joseph Brady  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street  
Philadelphia, PA 19107  
[fbrady@pa.gov](mailto:fbrady@pa.gov)

William C. Reilly, Esquire  
Reilly Law  
Garfield Square  
510 West Market Street  
Pottsville, PA 17901  
[wcr@reileylaw.law](mailto:wcr@reileylaw.law)

Glenn T. Roth, Jr. Esquire  
Office of the County Solicitor  
Schuylkill County Courthouse  
401 North Second Street  
Pottsville, PA 17901  
[groth@co.schuylkill.pa.us](mailto:groth@co.schuylkill.pa.us)  
*Counsel for Schuylkill County*

Benjamin C. Dunlap, Jr., Esquire  
Cohen Seglias Greenhall & Furman PC  
240 N. 3<sup>rd</sup> Street, 7<sup>th</sup> Floor  
Harrisburg, PA 17101  
[bdunlap@cohenseglias.com](mailto:bdunlap@cohenseglias.com)  
*Counsel for Reilly Township*

Lawrence J. Moran, Jr., Esq.  
Jennifer Menichini, Esq.  
Brendan N. Fitzgerald, Esq.  
Joyce, Carmody & Moran, P.C.  
9 North Main Street, Suite 4  
Pittston, PA 18640  
[ljm@joycecarmody.com](mailto:ljm@joycecarmody.com)  
[jm@joycecarmody.com](mailto:jm@joycecarmody.com)  
[bnf@joycecarmody.com](mailto:bnf@joycecarmody.com)  
*Counsel for Reading Blue Mountain and  
Northern Railroad Company*

Martin J. Cerullo, Esq.  
Bowe & Odorizzi Law, LLC  
450 W. Market Street  
Pottsville, PA 17901  
[marty@boweodorizzilaw.com](mailto:marty@boweodorizzilaw.com)  
*Counsel for Blackwood, Inc.*



---

Michael L. Swindler  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)