



Benjamin C. Dunlap Jr.
Partner

240 North Third Street
7th Floor
Harrisburg, PA 17101
T: 717.234.5530 | D: (717) 480-5303
bdunlap@cohenseglias.com
www.cohenseglias.com

January 8, 2025

VIA ELECTRONIC FILING

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

***Re: Complaint filed by the Borough of Eddystone verses Consolidated Rail Corporation & CSX Transportation, Inc., alleging falling debris from railroad overpasses onto the public sidewalk and other issues at the public crossing (DOT 541 055 F) where Eddystone Avenue crosses, below grade, the tracks of Consolidated Rail Corporation located in the Borough of Eddystone, Delaware County
Docket No. C-2019-3015101***

Dear Secretary Chiavetta:

As counsel for Consolidated Rail Corporation in the above-referenced matter, please be advised that my contact information has changed. My new contact information is listed above. Service of all documents for Consolidated Rail Corporation should be directed to me. A copy has been served upon all interested parties of record. Thank you.

Sincerely yours,



Benjamin C. Dunlap, Jr.

BCD:klg
Enclosures
cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Complaint filed by the Borough of Eddystone :
verses Consolidated Rail Corporation & CSX :
Transportation, Inc., alleging falling debris : No. C-2019-3015101
from railroad overpasses onto the public :
sidewalk and other issues at the public :
crossing (DOT 541 055 F) where Eddystone : Electronically Filed
Avenue crosses, below grade, the tracks of :
Consolidated Rail Corporation located in the :
Borough of Eddystone, Delaware County :
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54, via electronic mail:

Karen Cummings, Esquire
PennDOT
PO Box 8212
Harrisburg, PA 17105-8212
kcummings@pa.gov

Timothy E. Possenti
Solicitor for Eddystone Borough
3101 Chichester Avenue
Upper Chichester, PA 19061
TEPEsq@gmail.com

William M. Sinick, P.E.
PA Public Utility Commission
Bureau of Technical Utility Services
Commonwealth Keystone Building
400 North Street, 3rd Floor
Harrisburg, PA 17120
wilsinick@pa.gov

Michael L. Maddren, Esquire
Delaware County Solicitors Office
Government Center
201 W. Front Street, 2nd Floor
Media, PA 19063
OfficeOfSolicitor@co.delaware.pa.us

Patricia Biswanger, Esquire
217 North Monroe Street
Media, PA 19063
patbiswanger@gmail.com

Peter C. Amuso, Esquire
Rudolph Clarke LLC
Seven Neshaminy Interplex, Suite 200
Trevose, PA 19053
pamuso@rudolphclarke.com

/s/ Karen L. Gagne

Karen L. Gagne, Administrative Assistant to
Benjamin C. Dunlap, Jr., Esquire

Date: January 8, 2025