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June 6, 2024

Via Alternative Electronic Filing

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street S.W.
Atlanta, GA 30334

In Re*:* Sandersville Railroad Company; Hancock County, Georgia Acquisition;
Docket No. 45045;
Response to Joint Notice of Intent to Reply and Joint Motion to Stay Assignment of Oral Argument Date Until After June 20, 2024

Dear Ms. Tanner:

Petitioner Sandersville Railroad Company objects to the requests of Respondents and Intervenors (together, the "Opponents") to delay these proceedings. Opponents seek (1) an unnecessarily protracted time in which to reply to Petitioner's response to their Applications for Full Commission Review (and for a stay of any decision favoring Petitioner) and (2) to postpone the Commission's scheduling of Oral Argument.

Opponents have acted in lockstep to oppose Sandersville's Petition for Commission authority to acquire real estate by condemnation. Through their collective team of at least 10 attorneys, they have sought to obfuscate the facts and requirements of the statute and have made it clear that they desire to appeal to the highest courts any Commission decision with which they do not agree. The Commission should reject this strategy and proceed in the usual order.

Opponents filed their respective Applications for Full Commission Review of the Hearing Officer's Initial Decision, Request for Oral Argument, and Motion for Stay of Order on April 30, 2024 and on May 1, 2024.

On May 22, 2024, Sandersville filed its Brief in Opposition to Applications for Full Commission Review, Requests for Oral Argument, and Motion for Stay of Order.

Reply briefs are typically required within 21 days or less. *E.g.*, Federal Rules of Appellate Procedure Rule 31 (A reply brief must be filed "within 21 days after service of the" responsive brief); United States District Court for the Northern District of Georgia Local Rule 7.1 (C) ("[T]he reply must be served not later than fourteen (14) days after service of the responsive" brief); Georgia Supreme Court Rule 10(2) (Reply briefs are due within 10 days after the filing of the responsive brief); Georgia Court of Appeals Rule 23(c) (Reply briefs must be filed within 20 days

after the responsive brief is filed). Opponents seek more than a week's extra time without good cause.

If the Opponents' counsel were solo practitioners or from small firms, they might need additional time. However, Opponents are represented by two teams of lawyers from national organizations and two other Georgia law firms acting as local counsel. There is no valid argument that Opponents cannot submit a response within 20 days, by June 11, 2024.

The Commission should impose June 11 as the deadline for Opponents' response. Simultaneously, even if the Commission allows Opponents extra time, it should set the earliest date convenient to the Commission for oral argument – both to expedite this proceeding and permit all parties to manage their schedules and travel plans accordingly.

Opponents claim that the Commission should delay the scheduling of oral argument so that the Commission can "consider a full presentation of the issues in a fair manner consistent with the needs of due process" makes no sense. Unlike the Opponents, Petitioner does not question the Commission's ability to timely read and digest the applications and related briefs. And expeditiously proceeding to oral argument raises no issues of fairness or due process.

For these reasons, Sandersville Railroad encourages the Commission to (1) allow Opponents 20 days to file their reply briefs and (2) schedule oral argument for the earliest date after that response as would be convenient for the Commission.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,



L. Craig Dowdy
For TAYLOR ENGLISH DUMA LLP

Enclosure
cc: all parties of record as listed on the Certificate of Service attached hereto

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In re: Sandersville Railroad Company; Hancock County, Georgia Acquisition	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **Letter on behalf of Sandersville Railroad in Response to Joint Notice of Intent to Reply and Joint Motion to Stay Assignment of Oral Argument Date Until After June 20, 2024** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

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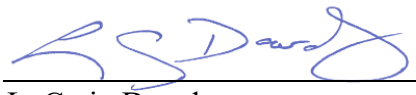
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This 6th day of June 2024.



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