



SLOVER & LOFTUS LLP

ATTORNEYS AT LAW

June 3, 2026

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VIA E-Filing

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

ENTERED
Office of Chief Counsel
June 3, 2026
Part of
Public Record

Re: *FD 36928, Unity Line, LLC d/b/a Manitowoc Port & Terminal
Railway – Operational Exemption – Rail Lines in Manitowoc County, WI*

The Unity Line, LLC d/b/a Manitowoc Port & Terminal Railway submits this response to the improper surreply filed by Wisconsin Central Ltd. ("WC/CN") on June 3, 2026. WC/CN's surreply to MP&TR's May 21, 2026 reply contravenes the Board's rules prohibiting a reply to a reply, CP/WC did not seek leave to file it, it raises no new issues and it continues to be wrong on the facts and the law, and thus the Board should not consider it. 49 C.F.R. § 1104.13(c) ("A reply to a reply is not permitted."); *Norfolk S. Corp. & Norfolk S. Ry. Co. – Acquisition of Control – Norfolk & Portsmouth Belt Line R.R. Co.*, FD 36836 (STB served Mar. 14, 2025) at 10 (Board Member Fuchs, concurring) (same).

Respectfully submitted,

Peter A. Pfohl

*An attorney for Unity Line, LLC d/b/a
Manitowoc Port & Terminal Railway*

cc: John Duncan Varda, Esq.

CERTIFICATE OF SERVICE

I hereby certify this 3rd day of June 2026, I caused a copy of the foregoing document to be served by first-class mail, postage prepaid, or by more expeditious means to all parties of record.

/s/
Peter A. Pfohl