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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of Union Pacific Railroad's)	
Petition for Relief against the Utah)	MOTION TO INTERVENE
Department of Transportation)	
)	DOCKET NO. 09-999-11
)	

Anderson Geneva, LLC, Ice Castle Retirement Fund L.L.C., and Anderson Geneva Development, Inc., owners and managers of property which was the former Geneva Steel manufacturing plant located in Vineyard, Utah, and the Town of Vineyard (herein collectively "Intervenors"), by and through their attorneys, hereby make this Motion to Intervene in the above matter, and request leave to file the attached Answer, Counter Petition, Cross Petition, and Third Party Petition Against Union Pacific Railroad Company, the Utah Department of Transportation, and Utah Transit Authority, respectively.

This Motion is made because the Petition of Union Pacific Railroad Company affects substantial property rights of Intervenors, including access and rights to property, and control of

public roads within Vineyard Town, and the additional parties named in Intervenor's Petitions have a substantial and fundamental role in the railroad crossing described in this matter. The intervention by Intervenor's will promote the efficient administration of justice by placing all interested parties under the jurisdiction of the Commission.

DATED this 20th day of November, 2009.

DENNIS M. ASTILL, PC LAW FIRM

By: _____
Dennis M. Astill
Attorneys for Anderson entities

BLAISDELL & CHURCH

By: _____
David L. Church
Attorneys for Town of Vineyard

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2009, a true and correct copy of the foregoing Motion to Intervene was served to the persons and in the manner below:

Michael Gisnberg, Assistant Attorney General Division of Public Utilities Box 146751 Salt Lake City, Utah 84114-6751 <i>counsel for the Division of Public Utilities</i>	(X) U.S. mail, first-class, postage prepaid () Facsimile () Hand Delivery () Overnight courier
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Reha K. Deal Union Pacific Railroad 280 South 400 West, Suite 250 Salt Lake City, Utah 84101 <i>counsel for Union Pacific Railroad</i>	(X) U.S. mail, first-class, postage prepaid () Facsimile () Hand Delivery () Overnight courier
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Renee Spooner, Assistant Attorney General 4501 S 2700 West Box 148455 Salt Lake City, Utah 84114 <i>counsel for UDOT</i>	(X) U.S. mail, first-class, postage prepaid () Facsimile () Hand Delivery () Overnight courier
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Bruce Jones 3600 South 700 West Salt Lake City, Utah 84119-4122 <i>counsel for UTA</i>	(X) U.S. mail, first-class, postage prepaid () Facsimile () Hand Delivery () Overnight courier
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