

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

In the Matter of
Winchester Post Office
Winchester IL 62694
(City of Winchester, Petitioner)

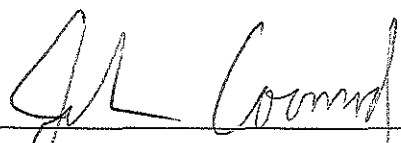
Docket No. A2016 - 2

MOTION TO DISMISS

NOW COMES the City of Winchester, Petitioner, by and through its attorney, John D. Coonrod, and prays this commission to dismiss its Appeal on Closing and Request for Suspension of Closing Pending Review, for reason that the United States Postal Service has abandoned its intended discontinuation of full postal service at the Winchester Post Office, as set out in the Addendum attached hereto.

Respectfully submitted,
The City of Winchester, Illinois

By:



Its attorney

John D. Coonrod
Coonrod Law Office
Attorney for the City of Winchester
P.O. Box 197
Winchester, IL 62694
Telephone: (217) 742-3455

ADDENDUM

John Coonrod

From: "John Coonrod" <coonrodlaw@frontier.com>
To: "Brooks, Samuel D - Chicago, IL" <Samuel.D.Brooks@usps.gov>
Cc: <Gail.Noll@usdoj.gov>; <jim.lewis2@usdoj.gov>
Sent: Friday, May 27, 2016 5:16 PM
Subject: Re: Winchester PO - Lease fully executed
Mr. Brooks,

That is correct. I will ensure the dismissal/withdrawal of the District Court and PRC proceedings next week.

Have a good weekend,

John

----- Original Message -----

From: Brooks, Samuel D - Chicago, IL
To: John Coonrod
Cc: Gail.Noll@usdoj.gov ; jim.lewis2@usdoj.gov
Sent: Friday, May 27, 2016 4:56 PM
Subject: RE: Winchester PO - Lease fully executed

Mr. Coonrod,

Please confirm that you will take appropriate action as requested.

Thanks,

Sam.

From: Brooks, Samuel D - Chicago, IL
Sent: Friday, May 27, 2016 4:56 PM
To: 'John Coonrod'
Cc: Gail.Noll@usdoj.gov; jim.lewis2@usdoj.gov
Subject: RE: Winchester PO - Lease fully executed

Mr. Coonrod,

Your understanding is correct. With the new fully executed lease agreement, Postal operations at the Winchester PO will return to the same status that existed prior to the issuance of the landlord's eviction notice.

Sam.

From: John Coonrod [<mailto:coonrodlaw@frontier.com>]
Sent: Friday, May 27, 2016 4:49 PM
To: Brooks, Samuel D - Chicago, IL
Cc: Gail.Noll@usdoj.gov; jim.lewis2@usdoj.gov
Subject: Re: Winchester PO - Lease fully executed

Mr. Brooks,

That is certainly welcome news. Just to confirm one final aspect - it was my understanding that in the interim, given the executed lease, operations at the Winchester Post Office will continue without interruption.

Please confirm at your earliest opportunity.

John

----- Original Message -----

From: Brooks, Samuel D - Chicago, IL

To: coonrodlaw@frontier.com

Cc: [Noll, Gail \(USAILC\) \(Gail.Noll@usdoj.gov\)](mailto:Noll, Gail (USAILC) (Gail.Noll@usdoj.gov)) ; jim.lewis2@usdoj.gov

Sent: Friday, May 27, 2016 4:12 PM

Subject: Winchester PO - Lease fully executed

Mr. Coonrod,

I am pleased to report that the new lease for the Winchester, IL Post Office has been signed by the Postal Service and the fully executed lease is being sent to the landlord. Per our prior discussion, I would appreciate an e-mail confirming that you will take action to ensure dismissal/withdrawal of both the District Court and PRC litigation. Civil Chief Gail Noll is available to assist as appropriate to ensure dismissal of the District Court action. I suspect that you can directly withdraw the PRC litigation; however, if you require any guidance please let me know and I will connect you with an attorney in the Postal Service's PRC litigation group.

Enjoy your weekend,

Sam.

Samuel D. Brooks

Senior Litigation Counsel

United States Postal Service

Law Department

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