

THE LAW OFFICES OF

LANE & LANE, LLC

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March 13, 2017

Via Email (FOIA@metrarr.com)

Freedom of Information Officer
15-E
547 W. Jackson Boulevard
Chicago, IL 60661

ATTORNEYS

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CAROLYN TORRES

Re: [REDACTED]

Our File No.: [REDACTED]

Date of Accident: January 26, 2017

FOIA REQUEST

Dear Sir or Madam:

Please be advised that I represent the [REDACTED], deceased. [REDACTED] died as a result of a motor vehicle collision. Specifically, on January 26, 2017 at approximately 7:00am, [REDACTED] vehicle was struck on Metra Union Pacific Northwest line by inbound train No. 610, which was scheduled to arrive in Chicago at 7:22am. The collision occurred as [REDACTED] attempted to cross the tracks while driving on Nagle near its intersection with Avondale and Somerset in the Norwood Park neighborhood on the northwest side of Chicago (near the Gladstone Park Station).

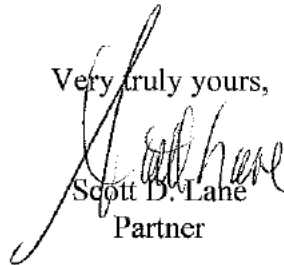
Pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 *et. seq.* (the "Act"), I hereby request a copy of the following information related to the incident:

1. Any and all videos of this incident (including, but not limited to, train dash cam, blue lights from nearby intersections, Citgo station, etc.);
2. Any and all photographs or videos of the scene, vehicles involved or individuals involved;
3. Any and all statements;

4. Any and all records, documents, notes or reports of any nature pertaining to this incident;
5. Any and all records, documents, notes or reports of any nature pertaining to any other train versus car incident at this crossing;
6. Any and all records, documents, notes or reports of any nature pertaining to inspections of this crossing for 10 years prior to this incident and to the present date;
7. Any and all recorder data of any nature pertaining to train information including, but not limited to, audio or video recordings, information regarding speed, or news, visibility/sight lines, brake application, etc.
8. Any and all police reports from any entity, including but not limited to Chicago Police, Metra Police and Union Pacific Railroad Police;
9. Any and all records and reports from the NTSB;
10. Any and all records pertaining to sequencing of traffic signals and gates at the crossing and the intersection of Nagle, Avondale and Somerset;
11. Any and all drawings, surveys and measurements of the subject crossing;
12. Any and all inspection reports and maintenance records pertaining to the train at issue (number 610) since the date of this incident and for 5 years prior to this incident;
13. Any and all dispatcher tapes;
14. Any and all conductor logs and time and delay reports;
15. Any and all records pertaining to the speed of the train at issue including, but not limited to, any and all speed tapes;
16. Any and all data generated by any event recorder pertaining to the train at issue including, but not limited to, speed, brake pipe pressure, brake pipe pressure reduction, horn use, visibility, route, etc.;
17. Any and all railroad timetable for the train issue for the date of this incident;
18. Any and all railroad operating and safety rules that were in effect on the date of this incident;

19. Any and all documents pertaining to any event recorder on the locomotive at issue and provide the name and address of the manufacturer, date recorder was installed, maintenance records, and identify any and all information relevant to the software used to process the event recorder data;
20. Any and all audio tapes and or transcripts of tapes of conversations between any dispatcher and the engineers/conductor of the subject train on the date of this incident;
21. Any and all recordings and transcripts of 911 calls relating to this incident;
22. Any and all event queries relating to this incident;
23. Any and all Chicago Department of Transportation records or footage of this incident;
24. Any and all blue light camera (pod cam) footage of this incident;
25. Any and all documents of any nature pertaining to any complaints regarding the condition of said crossing or the functioning of the signals or gates at the subject crossing prior to the incident; and
26. Any and all documents of any nature pertaining to the incident at issue.

Very truly yours,



Scott D. Lane
Partner

SDL/kg