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Office of Proceedings
December 21, 2017
Part of
Public Record

NOR 42144, 42150, 42152, 42153

VS.

Defendant.

None.

3. Plans to Address Outstanding Discovery

Arkema is collecting and reviewing records on a rolling basis to facilitate responses to Union Pacific's discovery requests.

4. Estimate of Time to Address Concerns

Arkema has encountered unexpected difficulty in identifying and collecting responsive documents, and it will not be able to complete its document production by December 31st.

Arkema still believes that any outstanding production will be completed by January 31, 2017, and it will update this estimate if circumstances change.

Respectfully submitted,

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Date: December 21, 2017

Certificate of Service

I certify that, on December 21, 2017, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone
Jason D. Tutrone