

Public Record

NOR 42144, 42150, 42152, 42153

VS.

Defendant.

Arkema's responses to all other Union Pacific discovery requests are complete. UP deposed two Arkema witnesses on August 30, 2018. UP served Arkema with follow-up information requests following the depositions on September 17, 2018. Arkema responded to UP on October 4, 2018.

2. Outstanding Discovery Concerns

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

Arkema has no outstanding discovery concerns.

4. Estimate of Time to Address Concerns

Arkema has no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
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Date: October 4, 2018

Certificate of Service

I certify that, on October 4, 2018, 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