

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
May 17, 2018
Part of
Public Record

Defendant.

None.

3. Plans to Address Outstanding Discovery

Arkema is continuing to produce documents to Union Pacific on a rolling basis and expects to complete production of responsive documents and a privilege log by June 1, 2018.

Arkema has contacted UP to initiate scheduling for the deposition of an Arkema witness.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: May 17, 2018

Certificate of Service

I certify that, on May 17, 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