

NOR 42144, 42150, 42152, 42153

Defendant.

Arkema has proposed certain measures to UP to expedite Arkema's review of electronic documents. Union Pacific is considering this request.

**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 expects that outstanding discovery will be addressed within the next week.

Respectfully submitted,

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Date: December 7, 2017

### **Certificate of Service**

I certify that, on December 7, 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  
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