

Arkema has responded to all of Union Pacific's discovery requests. On October 29, 2018, Arkema served its responses to Union Pacific's Third Set of Discovery Requests. Prior to this latest round of UP requests, Arkema had produced two witnesses for deposition by UP on August 30, 2018. Following the deposition, UP served Arkema with follow-up information requests on September 17, 2018, to which Arkema responded on September 27, 2018. UP also served Arkema with follow-up information requests concerning discovery documents on October 4, 2018, to which Arkema responded on October 11, 2018.

2. Outstanding Discovery Concerns

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

There is no outstanding discovery.

4. Estimate of Time to Address Concerns

Arkema has no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
Jeffrey O. Moreno
Jason D. Tutrone
Thompson Hine LLP
1919 M St. NW, Suite 700
Washington, DC 20036
(202) 331-8800

Counsel for Arkema Inc.

Date: November 1, 2018

Certificate of Service

I certify that, on November 1, 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.

/s/ Jason D. Tutrone
Jason D. Tutrone