

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
March 29, 2018
Part of
Public Record

NOR 42144, 42150, 42152, 42153

Complainants,

VS.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

Weekly Status Report of Arkema Inc.—March 29, 2018

Complainant Arkema Inc., submits this weekly status report on discovery progress pursuant to the Order that Administrative Judge Dring issued on March 2, 2017, in this proceeding.

1. Progress of Discovery

Arkema is continuing to collect and review records and will produce them on a rolling basis.

2. Outstanding Discovery Concerns

None.

3. Plans to Address Outstanding Discovery

Arkema was able to narrow the number of potentially responsive electronic files from approximately 39,000 files to 15,000 files. Many of these files are associated with e-mail

messages or e-mail attachments that appear non-responsive, but nonetheless increase the scope of records for production to approximately 29,000 files. Arkema is continuing to cull these files further for responsiveness using multiple methods. Once Arkema has narrowed the field of potentially responsive files to a reasonable level, it will begin production. Arkema will revise its estimate for completing production once it has made sufficient progress in culling these electronic files.

4. Estimate of Time to Address Concerns

There are 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: March 29, 2018

Certificate of Service

I certify that, on March 29, 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