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Office of Proceedings
November 8, 2018
Part of
Public Record

NOR 42144, 42150, 42152, 42153

VS.

Defendant.

On November 6, 2018, Union Pacific served Arkema with information requests following up on Arkema's responses to Union Pacific's Third Set of Discovery Requests. Arkema is preparing its responses to these requests. Arkema has responded to all other Union Pacific's discovery requests. On October 29, 2018, Arkema served its responses to Union Pacific's Third Set of Discovery Requests. Prior to receiving these 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
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Date: November 8, 2018

Certificate of Service

I certify that, on November 8, 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
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