

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

246908
246909
246910
246911

NORTH AMERICA FREIGHT CAR)
ASSOCIATION; AMERICAN FUEL &)
PETROCHEMICALS MANUFACTURERS;)
THE CHLORINE INSTITUTE; THE)
FERTILIZER INSTITUTE; AMERICAN)
CHEMISTRY COUNCIL; ETHANOL)
PRODUCTS, LLC D/B/A POET ETHANOL)
PRODUCTS; POET NUTRITION, INC.;)
CARGILL INCORPORATED; and ARKEMA)
INC.)
)
Complainants,)
)
vs.)
)
UNION PACIFIC RAILROAD COMPANY,)
)
Defendant.)

ENTERED
Office of Proceedings
December 13, 2018
Part of
Public Record

NOR 42144, 42150, 42152, 42153

Weekly Status Report of Arkema Inc.—December 13, 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 has responded to all of Union Pacific's discovery requests. On November 14, 2018, Arkema responded to Union Pacific's November 6, 2018, information requests, which pertain to Arkema's responses to Union Pacific's Third Set of Discovery Requests. On October 29, 2018, Arkema had 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
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: December 13, 2018

Certificate of Service

I certify that, on December 13, 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