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April 12, 2018
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NOR 42144, 42150, 42152, 42153

Complainants,

VS.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

Weekly Status Report of Arkema Inc.—April 12, 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 is continuing to filter for responsiveness the tens of thousands of e-mail records it has identified as potentially responsive to Union Pacific's requests, in addition to non-email

documents. To the extent Arkema has identified documents that have a high probability of being responsive to UP's requests, Arkema intends to begin a review of documents next week, with production to follow on a rolling basis thereafter. For documents that Arkema has not been able to classify as highly likely to be responsive, Arkema intends to contact UP shortly to discuss ways to mitigate this discovery burden while still being responsive to UP's discovery requests. 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,

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Date: April 12, 2018

Certificate of Service

I certify that, on April 12, 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
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