

Defendant.

Arkema expects to complete production of responsive documents and a privilege log by June 1, 2018. Arkema and Union Pacific are coordinating to schedule the deposition of an Arkema witness.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: May 24, 2018

Certificate of Service

I certify that, on May 24, 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