

246335

STB Docket Nos. NOR 42144, *et al.*
(Consolidated)

RHONDA S. FERGUSON
CRAIG V. RICHARDSON
DANIELLE E. BODE
Union Pacific Railroad Company
1400 Douglas Street
Omaha, Nebraska 68179
(402) 544-7004

MICHAEL L. ROSENTHAL
KAVITA PILLAI
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, D.C. 20001
(202) 662-6000

September 6, 2018

	)	
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.; and	)	STB Docket Nos. NOR 42144, <i>et al.</i>
CARGILL INCORPORATED,	)	(Consolidated)
	)	
Complainants,	)	
	)	
v.	)	
	)	
UNION PACIFIC RAILROAD COMPANY,	)	
	)	
Defendant.	)	
	)	

In accordance with the May 4, 2018, order of Administrative Law Judge John P. Dring, Union Pacific submits the following discovery status report.

Union Pacific has no outstanding document requests.

Union Pacific has completed its production of documents and other information. On September 4, 2018, complainants sent Union Pacific a series of questions regarding tank car shipment record data Union Pacific produced in discovery on June 23, 2016, and has since updated. Union Pacific will respond to those questions in a timely manner.

C. Depositions

Union Pacific deposited two witnesses designated by Arkema on August 30, 2018. Union Pacific is currently reviewing the deposition transcripts and anticipates sending Arkema follow-up questions within the next few days.

Respectfully submitted,

RHONDA S. FERGUSON
CRAIG V. RICHARDSON
DANIELLE E. BODE
Union Pacific Railroad Company
1400 Douglas Street
Omaha, Nebraska 68179
(402) 544-7004

/s/ Michael L. Rosenthal
MICHAEL L. ROSENTHAL
KAVITA PILLAI
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, D.C. 20001
(202) 662-6000

Attorneys for Union Pacific Railroad Company

September 6, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of September, 2018, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in NOR 42144, NOR 42150, NOR 42152, and NOR 42153 and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Michael L. Rosenthal
Michael L. Rosenthal