

NOR 42144, 42150, 42152, 42153

Defendant.

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

Arkema is searching for additional responsive documents pursuant to its agreement with Union Pacific. Union Pacific is scheduling a deposition of Arkema's witness on August 30th.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: August 2, 2018

Certificate of Service

I certify that, on August 2, 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