

NORTH AMERICA FREIGHT CAR	)	Office of
ASSOCIATION; AMERICAN FUEL &	)	July
PETROCHEMICALS MANUFACTURERS;	)	1
THE CHLORINE INSTITUTE; THE	)	Pub
FERTILIZER INSTITUTE; AMERICAN	)	
CHEMISTRY COUNCIL; ETHANOL	)	
PRODUCTS, LLC D/B/A POET ETHANOL	)	
PRODUCTS; POET NUTRITION, INC.;	)	
CARGILL INCORPORATED; and ARKEMA	)	NOR 42144, 42150, 42152, 42153
INC.	)	
	)	
Complainants,	)	
	)	
vs.	)	
	)	
UNION PACIFIC RAILROAD COMPANY,	)	
	)	
Defendant.	)	
	)	

Union Pacific has inquired about the scope of Arkema's search for documents that are responsive to Union Pacific's discovery requests. Arkema is gathering information to respond to this inquiry.

3. Plans to Address Outstanding Discovery

Arkema has proposed multiple dates extending into late August for the deposition of an Arkema witness. UP's counsel has declined to commit to a proposed deposition date until Arkema completed its document production and produced a privilege log. Now that it has done so, Arkema expects UP to agree to a proposed deposition date in the last week of August.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
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Counsel for Arkema Inc.

Date: July 19, 2018

Certificate of Service

I certify that, on July 19, 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