

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

ENTERED  
Office of Proceedings  
March 15, 2018  
Part of  
Public Record

Defendant.

Arkema has identified approximately 60,000 electronic files that are potentially responsive to Union Pacific's discovery requests and is attempting to cull these files further for

responsiveness using multiple methods. Once Arkema has narrowed the field of potentially responsive files to a reasonable level, it will begin production. 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,

/s/ Jason D. Tutrone  
Jeffrey O. Moreno  
Jason D. Tutrone  
Thompson Hine LLP  
1919 M St. NW, Suite 700  
Washington, DC 20036  
(202) 331-8800

*Counsel for Arkema Inc.*

Date: March 15, 2018

### **Certificate of Service**

I certify that, on March 15, 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