

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

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.;	)
CARGILL INCORPORATED; and ARKEMA	) NOR 42144, 42150, 42152, 42153
INC.	)
	)
Complainants,	)
	)
vs.	)
	)
UNION PACIFIC RAILROAD COMPANY,	)
	)
Defendant.	)
	)

Complainant Arkema Inc., submits this weekly status report on discovery progress pursuant to the Order that Administrative Judge Dring issued on March 2, 2017, in this proceeding.

Arkema has responded to all of Union Pacific's discovery requests. On November 15, 2018, Arkema responded to Union Pacific's November 6, 2018, information requests, which follow up on Arkema's responses to Union Pacific's Third Set of Discovery Requests. On October 29, 2018, Arkema had served its responses to Union Pacific's Third Set of Discovery Requests. Prior to receiving these UP requests, Arkema had produced two witnesses for deposition by UP on August 30, 2018. Following the deposition, UP served Arkema with follow-up information requests on September 17, 2018, to which Arkema responded on

September 27, 2018. UP also served Arkema with follow-up information requests concerning discovery documents on October 4, 2018, to which Arkema responded on October 11, 2018.

2. Outstanding Discovery Concerns

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

There is no outstanding discovery.

4. Estimate of Time to Address Concerns

Arkema has 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: November 15, 2018

Certificate of Service

I certify that, on November 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.

/s/ Jason D. Tutrone
Jason D. Tutrone