

NOR 42144, 42150, 42152, 42153

Defendant.

Arkema is collecting and reviewing records on a rolling basis to facilitate responses to Union Pacific's discovery requests.

4. Estimate of Time to Address Concerns

Arkema has identified additional potential custodians of records that are responsive to Union Pacific's discovery requests. Arkema is evaluating the impact that the addition of these custodians will have on the time needed to complete its responses to Union Pacific's discovery requests.

Respectfully submitted,

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Date: January 11, 2018

Certificate of Service

I certify that, on January 11, 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