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March 8, 2018
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Defendant.

None.

3. Plans to Address Outstanding Discovery

Arkema has gathered and is currently reviewing electronic records for responsiveness to UP's discovery requests. Arkema will have an update next week as to the date it expects to complete production to UP.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: March 8, 2018

Certificate of Service

I certify that, on March 8, 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