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Defendant.

There are no outstanding concerns at this time, but concerns may arise as Arkema prepares responses to Union Pacific's discovery requests.

3. Plans to Address Outstanding Discovery

Arkema is collecting and reviewing records on a rolling basis to facilitate responses to Union Pacific's discovery requests. Also, Arkema is evaluating stipulations that will be responsive to certain discovery requests by Union Pacific.

4. Estimate of Time to Address Concerns

Arkema estimates that it will begin producing records by the end of this week and that it will begin the bulk of its production within 3-6 weeks. This estimate may change because Arkema and Union Pacific are still in the early stages of the discovery process.

Respectfully submitted,

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Date: November 2, 2017

Certificate of Service

I certify that, on November 2, 2017, 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