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BEFORE THE
SURFACE TRANSPORTATION BOARD

ENTERED
Office of Proceedings
April 5, 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 INC.	)	NOR 42144, 42150, 42152, 42153
Complainants,	)	
vs.	)	
UNION PACIFIC RAILROAD COMPANY,	)	
Defendant.	)	

Weekly Status Report of Arkema Inc.—April 5, 2018

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.

1. Progress of Discovery

Arkema is continuing to collect and review records and will produce them on a rolling basis.

2. Outstanding Discovery Concerns

None.

3. Plans to Address Outstanding Discovery

Arkema is continuing to filter for responsiveness the tens of thousands of e-mail records it has identified as potentially responsive to Union Pacific's requests, in addition to non-email

documents. Arkema intends to contact UP shortly to discuss ways to mitigate this discovery burden while still being responsive to UP's discovery requests. 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

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Date: April 5, 2018

Certificate of Service

I certify that, on April 5, 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