

NORTH AMERICA FREIGHT CAR	)	Office of
ASSOCIATION; AMERICAN FUEL &	)	Jun
PETROCHEMICALS MANUFACTURERS;	)	I
THE CHLORINE INSTITUTE; THE	)	Pub
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.	)	
	)	

Union Pacific has requested additional information about the process Arkema used for removing duplicates from the records it collected and about the scope of files maintained by custodians. Arkema is investigating these items and plans to respond shortly.

3. Plans to Address Outstanding Discovery

Arkema is creating a privilege log pursuant to the Protocol for the Production Electronically-Stored Information and Paper Documents that applies to this proceeding. Arkema has proposed dates for the deposition of an Arkema witness the week of June 18th or July 9th. UP counsel has indicated they have a conflict with the former and has not yet responded as to the latter.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
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Counsel for Arkema Inc.

Date: June 7, 2018

Certificate of Service

I certify that, on June 7, 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