

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.	)	
	)	

None.

3. Plans to Address Outstanding Discovery

Arkema is currently completing redactions on responsive privileged documents, and expects to produce the redacted documents by early next week. Arkema will also produce a privilege log shortly after it completes this production.

Arkema has proposed multiple dates extending into late August for the deposition of an Arkema witness. UP's counsel has declined to commit to a proposed date until Arkema has produced all additional documents recently identified as potentially responsive and a privilege log.

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 28, 2018

Certificate of Service

I certify that, on June 28, 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