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November 30, 2017
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Public Record

NOR 42144, 42150, 42152, 42153

VS.

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

There are no concerns at this time.

Respectfully submitted,

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Date: November 30, 2017

Certificate of Service

I certify that, on November 30, 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