

246532
246533
246534
246535

ENTERED
Office of Proceedings
October 25, 2018
Part of
Public Record

On October 12, 2018, Union Pacific served its Third Set of Discovery Requests on Arkema, which is preparing its responses to the requests. Arkema has responded to all of Union Pacific's other discovery requests, and produced two witnesses for deposition by UP on August 30, 2018. Following the deposition, UP served Arkema with follow-up information requests on September 17, 2018, to which Arkema responded on September 27, 2018. UP also served Arkema with follow-up information requests concerning discovery documents on October 4, 2018, to which Arkema responded on October 11, 2018.

2. Outstanding Discovery Concerns

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

Arkema intends to respond to UP's Third Set of Discovery Requests within the time frame provided by the Board's rules, if not sooner.

4. Estimate of Time to Address Concerns

Arkema has no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
Jeffrey O. Moreno
Jason D. Tutrone
Thompson Hine LLP
1919 M St. NW, Suite 700
Washington, DC 20036
(202) 331-8800

Counsel for Arkema Inc.

Date: October 18, 2018

Certificate of Service

I certify that, on October 18, 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.

/s/ Jason D. Tutrone
Jason D. Tutrone