

Public Record

NOR 42144, 42150, 42152, 42153

Defendant.

Over the past week, Arkema was able to narrow the number of potentially responsive electronic files from approximately 60,000 files to approximately 39,000 files. Many of these

files are associated with e-mail messages or e-mail attachments that appear non-responsive, but nonetheless increase the scope of records for production to approximately 73,000 files. Arkema is continuing to cull these files further for responsiveness using multiple methods. 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,

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Certificate of Service

I certify that, on March 22, 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