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July 12, 2018
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NOR 42144, 42150, 42152, 42153

VS.

Defendant.

Complainant Arkema Inc., submits this weekly status report on discovery progress pursuant to the Order that Administrative Judge Dring issued on March 2, 2017, in this proceeding.

Arkema has completed its production of documents in response to Union Pacific's discovery requests and produced a privilege log.

Union Pacific has inquired about certain documents that Arkema produced or listed on the privilege log and about the custodians searched. Arkema has responded to these requests and is producing an updated privilege log with minor adjustments.

3. Plans to Address Outstanding Discovery

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 deposition date until Arkema completed its document production and produced a privilege log. Now that it has done so, Arkema expects UP to agree to a proposed deposition date in the last week of August.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: July 12, 2018

Certificate of Service

I certify that, on July 12, 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