

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

In re:

MONTREAL MAINE & ATLANTIC
RAILWAY, LTD.

Debtor.

Bk. No. 13-10670
Chapter 11

**APPELLEE’S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL**

Robert J. Keach, the chapter 11 trustee (the “Trustee”) in the above-captioned case, and appellee in the appeal by Travelers Property Casualty Company of America (“Travelers”) of the order of the United States Bankruptcy Court for the District of Maine denying Travelers’ motion for relief from the automatic stay [Docket No. 364], designates the following additional items for inclusion in the record pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure.

1. *Motion for Order Adopting Cross-Border Insolvency Protocol* [Docket No. 126], dated August 30, 2013;
2. Minute Entry with respect to September 4, 2013 hearing [Docket No. 160];
3. *Order Adopting Cross-Border Insolvency Protocol* [Docket No. 168], dated September 4, 2013;
4. Minute Entry with respect to September 13, 2013 hearing [Docket No. 240];
5. Minute Entry with respect to October 1, 2013 hearing [Docket No. 308];
6. *Notice by Travelers Property Casualty Company of America That It Waives an Evidentiary Hearing on Its Motion for Relief from the Automatic Stay* [Docket No. 340], dated October 4, 2013;
7. *Notice of Appeal* [Docket No. 397], dated October 23, 2013;

8. *Appellant's Statement of Election to Have the United States District Court Hear Appeal* [Docket No. 398], dated October 23, 2013;
9. *Motion for an Order Extending the Stay Period and to Approve a Cross-Border Insolvency Protocol*, dated September 3, 2013 [filed in Superior Court, Province of Québec, District of Saint-Francois, Case No. 450-11-000167-134];
10. *Order*, dated September 4, 2013 [entered in Superior Court, Province of Québec, District of Saint-Francois, Case No. 450-11-000167-134];
11. *Motion to Lift the Stay of Proceedings*, dated August 27, 2013 [filed in Superior Court, Province of Québec, District of Montreal, Case No. 500-11-045097-139]; and
12. *Judgment*, dated October 9, 2013 [entered in Superior Court, Province of Québec, District of Saint-Francois, Case No. 450-11-000167-134].

Dated: November 19, 2013

ROBERT J. KEACH,
CHAPTER 11 TRUSTEE OF MONTREAL
MAINE & ATLANTIC RAILWAY, LTD.

By his attorneys:

/s/ Michael A. Fagone
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