

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MAINE

In re)	
)	
MONTREAL MAINE & ATLANTIC RAILWAY, LTD.)	CHAPTER 11
)	CASE NO. 13-10670-LHK
Debtor)	
)	

**AMENDED VERIFIED STATEMENT CONCERNING REPRESENTATION OF
UNOFFICIAL COMMITTEE OF WRONGFUL DEATH CLAIMANTS
AS REQUIRED BY FED. R. BANKR. P. 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Daniel C. Cohn, on behalf of Murtha Cullina LLP ("Murtha"), and George W. Kurr, Jr., on behalf of Gross, Minsky & Mogul, P.A. ("GMM"), hereby state:

1. Murtha and GMM are counsel to the Unofficial Committee of Wrongful Death Claimants (the "Unofficial Committee") in this case, consisting of the representatives the estates of the 47 victims of the massive explosion in Lac-Mégantic, Quebec, on July 6, 2013, resulting from derailment of the Debtor's train (the "Disaster") as identified in Exhibit A to this Statement (the "Wrongful Death Claimants"), and to the Wrongful Death Claimants themselves. Exhibit A consists of a list of the Wrongful Death Claimants including the names of estate representatives and the victims whom they represent; to protect their privacy, the address for each estate representative is listed in care of the Personal Injury Counsel serving as such representative's primary counsel.

2. The Unofficial Committee was formed in response to statements of this Court at the hearing of September 13, 2013, on whether an official creditors' committee should be formed. Daniel C. Cohn was engaged as bankruptcy counsel and GMM as local bankruptcy counsel for the Unofficial Committee, by the Wrongful Death Claimants' personal injury counsel, The

Webster Law Firm of Houston, Texas; Meyers & Flowers, LLC of St. Charles, Illinois and Weller, Green, Toups & Terrell LLP of Beaumont, Texas (collectively, "Personal Injury Counsel"). Personal Injury Counsel had earlier engaged Murtha and GMM to provide services related to the Debtor's Chapter 11 case on behalf of all of their respective clients having wrongful death claims against the Debtor.

3. The Wrongful Death Claimants hold unliquidated wrongful death claims against the Debtor's estate arising from the Disaster. It is possible that certain of the Wrongful Death Claimants and/or certain beneficiaries of the decedents' estates that they represent hold other types of claims against the Debtor's estate, such as business interruption and property damage. Except as described in this paragraph, the Wrongful Death Claimants hold no disclosable economic interest in relation to the Debtor.¹ Murtha and GMM do not possess any claims against or interests in the Debtor. There is no written instrument concerning authorization of the Unofficial Committee to act on behalf of any party in interest.

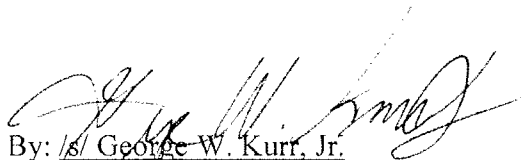
4. This Statement and the annexed exhibit are not intended and should not construed to limit, waive or otherwise alter the Wrongful Death Claimants' rights, including but not limited to the right to assert, file and/or amend claims in accordance with applicable law and any orders entered in this case.

[REMAINDER OF THE PAGE LEFT INTENTIONALLY BLANK]

¹ The Unofficial Committee does reserve the right, however, to seek payment by the Debtor's estate of the Unofficial Committee's expenses, including fees and reimbursable expenses of its professionals.

5. Murtha and GMM will amend this Statement to the extent necessary in accordance with Fed. R. Bankr. P. 2019.

Dated: January 28, 2014


By: /s/ George W. Kurr, Jr.
George W. Kurr, Jr.
GROSS, MINSKY & MOGUL, P.A.
23 Water Street, Suite 400
P. O. Box 917
Bangor, ME 04402-0917
Phone: (207) 942-4644 ext. 206
Fax: (207) 942-3699
gwkurr@grossminsky.com

and

Daniel C. Cohn, *pro hac vice*
Taruna Garg, *pro hac vice*
MURTHA CULLINA LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110
Phone: (617) 457-4000
Fax: (617) 482-3868

*Counsel for the Unofficial Committee of Wrongful
Death Claimants*

VERIFICATION

Daniel C. Cohn, a partner of Murtha, and George W. Kurr, Jr., a partner of GMM, each hereby verifies that he has read the foregoing Verified Statement Concerning Representation of Unofficial Committee of Wrongful Death Claimants as Required by Fed. R. Bankr. P. 2019 and that the statements contained therein are true and accurate based on his own personal knowledge, including information learned from Personal Injury Counsel.

Signed under the penalties of perjury.

Daniel Cohn (w/permission)
Jg

Daniel C. Cohn

Dated: _____

George W. Kurr, Jr.

George W. Kurr, Jr.

Dated: 1/28/2014

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MAINE

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)	CHAPTER 11
MONTREAL MAINE & ATLANTIC)	CASE NO. 13-10670-LHK
RAILWAY, LTD.)	
)	
Debtor)	
_____)	

CERTIFICATE OF SERVICE

I, Taruna Garg, hereby certify that I caused a copy of the *Amended Verified Statement Concerning Representation of Unofficial Committee of Wrongful Death Claimants As Required by FED. R. BANKR. P. 2019* to be served via the Court's CM/ECF system and by U.S. First Class Mail on January 28, 2014, as indicated, upon the parties listed on the attached Service List.

/s/ Taruna Garg
Taruna Garg, Esq. – BBO #654665
Murtha Cullina LLP
99 High Street
Boston, MA 02110
617-457-4000 Telephone
617-482-3868 Facsimile
tgarg@murthalaw.com

Served on January 28, 2014 via CM/ECF:

D. Sam Anderson, Esq. on behalf of Attorney Bernstein, Shur, Sawyer & Nelson
sanderson@bernsteinshur.com,
acummings@bernsteinshur.com;sspizuoco@bernsteinshur.com;astewart@bernsteinshur.com

D. Sam Anderson, Esq. on behalf of Trustee Robert J. Keach
sanderson@bernsteinshur.com,
acummings@bernsteinshur.com;sspizuoco@bernsteinshur.com;astewart@bernsteinshur.com

Aaron P. Burns on behalf of Interested Party New England Independent Transmission Company,
LLC
aburns@pearcedow.com, rpearce@pearcedow.com,lsmith@pearcedow.com

Richard Paul Campbell on behalf of Creditor Progress Rail Services Corporation
rpcampbell@campbell-trial-lawyers.com, mmichitson@campbell-trial-lawyers.com

Roger A. Clement, Jr., Esq. on behalf of Attorney Verrill Dana LLP
rclement@verrilldana.com, nhull@verrilldana.com;bankr@verrilldana.com

Roger A. Clement, Jr., Esq. on behalf of Debtor Montreal Maine & Atlantic Railway Ltd.
rclement@verrilldana.com, nhull@verrilldana.com;bankr@verrilldana.com

Roger A. Clement, Jr., Esq. on behalf of Trustee Robert J. Keach
rclement@verrilldana.com, nhull@verrilldana.com;bankr@verrilldana.com

Daniel C. Cohn, Esq. on behalf of Creditor Estates of Marie Alliance, et al
dcohn@murthalaw.com, njoyce@murthalaw.com

Maire Bridin Corcoran Ragozzine, Esq. on behalf of Defendant Robert J. Keach, in his capacity
as Chapter 11 Trustee of Maine Montreal and Atlantic Railway, Ltd.
mcorcoran@bernsteinshur.com,
sspizuoco@bernsteinshur.com;astewart@bernsteinshur.com;acummings@bernsteinshur.com;kfo
x@bernsteinshur.com;kquirk@bernsteinshur.com

Maire Bridin Corcoran Ragozzine, Esq. on behalf of Trustee Robert J. Keach
mcorcoran@bernsteinshur.com,
sspizuoco@bernsteinshur.com;astewart@bernsteinshur.com;acummings@bernsteinshur.com;kfo
x@bernsteinshur.com;kquirk@bernsteinshur.com

Keith J. Cunningham, Esq. on behalf of Creditor Eastern Maine Railway Company
kcunningham@pierceatwood.com, mpottle@pierceatwood.com;rkelly@pierceatwood.com

Keith J. Cunningham, Esq. on behalf of Creditor Maine Northern Railway Company
kcunningham@pierceatwood.com, mpottle@pierceatwood.com;rkelly@pierceatwood.com

Keith J. Cunningham, Esq. on behalf of Creditor New Brunswick Southern Railway Company
kcunningham@pierceatwood.com, mpottle@pierceatwood.com;rkelly@pierceatwood.com

Debra A. Dandeneau on behalf of Creditor CIT Group, Inc.
, arvin.maskin@weil.com

Joshua R. Dow, Esq. on behalf of Creditor Canadian Pacific Railway
jdow@pearcedow.com, rpearce@pearcedow.com;lsmith@pearcedow.com

Joshua R. Dow, Esq. on behalf of Creditor Canadian Pacific Railway Co.
jdow@pearcedow.com, rpearce@pearcedow.com;lsmith@pearcedow.com

Michael A. Fagone, Esq. on behalf of Attorney Bernstein, Shur, Sawyer & Nelson
mfagone@bernsteinshur.com,
acummings@bernsteinshur.com;astewart@bernsteinshur.com;sspizuoco@bernsteinshur.com;kq
uirk@bernsteinshur.com;kfox@bernsteinshur.com

Michael A. Fagone, Esq. on behalf of Debtor Montreal Maine & Atlantic Railway Ltd.
mfagone@bernsteinshur.com,
acummings@bernsteinshur.com;astewart@bernsteinshur.com;sspizuoco@bernsteinshur.com;kq
uirk@bernsteinshur.com;kfox@bernsteinshur.com

Michael A. Fagone, Esq. on behalf of Defendant Robert J. Keach, in his capacity as Chapter 11
Trustee of Maine Montreal and Atlantic Railway, Ltd.
mfagone@bernsteinshur.com,
acummings@bernsteinshur.com;astewart@bernsteinshur.com;sspizuoco@bernsteinshur.com;kq
uirk@bernsteinshur.com;kfox@bernsteinshur.com

Michael A. Fagone, Esq. on behalf of Trustee Robert J. Keach
mfagone@bernsteinshur.com,
acummings@bernsteinshur.com;astewart@bernsteinshur.com;sspizuoco@bernsteinshur.com;kq
uirk@bernsteinshur.com;kfox@bernsteinshur.com

Daniel R. Felkel, Esq. on behalf of Creditor Dakota Plains Transloading, LLC, Dakota Petroleum
Transport Solutions LLC, Dakota Plains Marketing LLC
dfelkel@troubhheisler.com

Jeremy R. Fischer on behalf of Interested Party Indian Harbor Insurance Company
jfischer@dwmlaw.com, aprince@dwmlaw.com

Jeremy R. Fischer on behalf of Interested Party Railroad Acquisition Holdings LLC
jfischer@dwmlaw.com, aprince@dwmlaw.com

Jeremy R. Fischer on behalf of Interested Party XL Insurance Company, Ltd.
jfischer@dwmlaw.com, aprince@dwmlaw.com

Isaiah A. Fishman on behalf of Creditor C. K. Industries, Inc.
ifishman@krasnowsaunders.com,
ryant@krasnowsaunders.com;cvalente@krasnowsaunders.com

Peter J. Flowers on behalf of Creditor Estates of Stephanie Bolduc
pjf@meyers-flowers.com

Christopher Fong, Esq. on behalf of Creditor Informal Committee of Quebec Claimants
christopherfong@paulhastings.com

Christopher Fong, Esq. on behalf of Creditor Official Committee of Victims
christopherfong@paulhastings.com

Taruna Garg, Esq. on behalf of Creditor Estates of Marie Alliance, et al
tgarg@murthalaw.com, cball@murthalaw.com;kpatten@murthalaw.com

Jay S. Geller on behalf of Creditor Western Petroleum Corporation
jgeller@maine.rr.com

Craig Goldblatt on behalf of Interested Party XL Insurance Company, Ltd.
craig.goldblatt@wilmerhale.com

Frank J. Guadagnino on behalf of Creditor Maine Department of Transportation
fguadagnino@clarkhillthorpreed.com

Michael F. Hahn, Esq. on behalf of Creditor Bangor Savings Bank
mhahn@eatonpeabody.com,
clavertu@eatonpeabody.com;dcroizier@eatonpeabody.com;jmiller@eatonpeabody.com

Andrew Helman, Esq. on behalf of Creditor Wheeling & Lake Erie Railway Company
ahelman@mcm-law.com, bankruptcy@mcm-law.com

Andrew Helman, Esq. on behalf of Plaintiff Wheeling & Lake Erie Railway Company
ahelman@mcm-law.com, bankruptcy@mcm-law.com

Paul Joseph Hemming on behalf of Creditor Canadian Pacific Railway Co.
phemming@briggs.com, pkringen@briggs.com

Seth S. Holbrook on behalf of Creditor Atlantic Specialty Insurance Company
holbrook_murphy@msn.com

Nathaniel R. Hull, Esq. on behalf of Debtor Montreal Maine & Atlantic Railway Ltd.
nhull@verrilldana.com, bankr@verrilldana.com

David C. Johnson on behalf of Creditor Wheeling & Lake Erie Railway Company

bankruptcy@mcm-law.com, djohnson@mcm-law.com

David C. Johnson on behalf of Plaintiff Wheeling & Lake Erie Railway Company
bankruptcy@mcm-law.com, djohnson@mcm-law.com

Jordan M. Kaplan, Esq. on behalf of Creditor Brotherhood of Locomotive Engineers and
Trainmen
jkaplan@zwerdling.com, mwolly@zwerdling.com

Robert J. Keach, Esq. on behalf of Trustee Robert J. Keach
rkeach@bernsteinshur.com,
acummings@bernsteinshur.com;astewart@bernsteinshur.com;kquirk@bernsteinshur.com

Curtis E. Kimball, Esq. on behalf of Creditor Center Beam Flat Car Company, Inc.
ckimball@rudman-winchell.com, jphair@rudman-winchell.com;cderrah@rudmanwinchell.com

Curtis E. Kimball, Esq. on behalf of Creditor First Union Rail
ckimball@rudman-winchell.com, jphair@rudman-winchell.com;cderrah@rudmanwinchell.com

Curtis E. Kimball, Esq. on behalf of Creditor J. M. Huber Corporation
ckimball@rudman-winchell.com, jphair@rudman-winchell.com;cderrah@rudmanwinchell.com

Andrew J. Kull, Esq. on behalf of Creditor Estate of Jefferson Troester
akull@mittelasen.com, ktrogner@mittelasen.com

George W. Kurr, Jr. on behalf of Creditor Estates of David Lacroix Beaudoin
gwkurr@grossminsky.com, tmseymour@grossminsky.com

George W. Kurr, Jr. on behalf of Creditor Estates of Marie Alliance, et al
gwkurr@grossminsky.com, tmseymour@grossminsky.com

George W. Kurr, Jr. on behalf of Creditor Estates of Stephanie Bolduc
gwkurr@grossminsky.com, tmseymour@grossminsky.com

George W. Kurr, Jr. on behalf of Creditor Real Custeau Claimants et al
gwkurr@grossminsky.com, tmseymour@grossminsky.com

Alan R. Lepene, Esq. on behalf of Creditor Eastern Maine Railway Company
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Alan R. Lepene, Esq. on behalf of Creditor Maine Northern Railway Company
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Alan R. Lepene, Esq. on behalf of Creditor New Brunswick Southern Railway Company
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Alan R. Lepene, Esq. on behalf of Interested Party Irving Paper Limited
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Alan R. Lepene, Esq. on behalf of Interested Party Irving Pulp & Paper, Limited
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Alan R. Lepene, Esq. on behalf of Interested Party J.D. Irving, Limited
Alan.Lepene@ThompsonHine.com, Cathy.Heldt@ThompsonHine.com

Edward MacColl, Esq. on behalf of Creditor CIT Group, Inc.
emaccoll@thomport.com,
bbowman@thomport.com;jhuot@thomport.com;eakers@thomport.com

Benjamin E. Marcus, Esq. on behalf of Interested Party Railroad Acquisition Holdings LLC
bmarcus@dwmlaw.com, hwhite@dwmlaw.com;dsoucy@dwmlaw.com

Benjamin E. Marcus, Esq. on behalf of Interested Party XL Insurance Company, Ltd.
bmarcus@dwmlaw.com, hwhite@dwmlaw.com;dsoucy@dwmlaw.com

George J. Marcus, Esq. on behalf of Creditor Wheeling & Lake Erie Railway Company
bankruptcy@mcm-law.com

George J. Marcus, Esq. on behalf of Plaintiff Wheeling & Lake Erie Railway Company
bankruptcy@mcm-law.com

Patrick C. Maxcy, Esq. on behalf of Creditor Rail World, Inc.
patrick.maxcy@dentons.com

Patrick C. Maxcy, Esq. on behalf of Defendant LMS Acquisition Corp.
patrick.maxcy@dentons.com

Patrick C. Maxcy, Esq. on behalf of Defendant Montreal Maine & Atlantic Corporation
patrick.maxcy@dentons.com

Patrick C. Maxcy, Esq. on behalf of Other Prof. Edward A. Burkhardt, Robert Grindrod, Gaynor
Ryan, Joseph McGonigle, Donald M. Gardner, Jr., Cathy Aldana, Rail World, Inc, Rail World
Holdings, LLC, Rail World Locomotive Leasing, LLC and Earlston As
patrick.maxcy@dentons.com

John R McDonald, Esq. on behalf of Creditor Canadian Pacific Railway Co.
jmcdonald@briggs.com, mjacobson@briggs.com

Kelly McDonald, Esq. on behalf of Creditor Camden National Bank
kmcdonald@mpmlaw.com, kwillette@mpmlaw.com

Kelly McDonald, Esq. on behalf of Creditor GNP Maine Holdings, LLC

kmcdonald@mpmlaw.com, kwillette@mpmlaw.com

James F. Molleur, Esq. on behalf of Creditor Brotherhood of Locomotive Engineers and Trainmen

jim@molleurlaw.com,

all@molleurlaw.com;tanya@molleurlaw.com;jen@molleurlaw.com;barry@molleurlaw.com;kati@molleurlaw.com;martine@molleurlaw.com;Jessica@molleurlaw.com

Ronald Stephen Louis Molteni, Esq. on behalf of Interested Party Surface Transportation Board
moltenir@stb.dot.gov

Victoria Morales on behalf of Creditor Maine Department of Transportation

Victoria.Morales@maine.gov,

rhotaling@clarkhillthorpreed.com,Toni.Kemmerle@maine.gov,ehocky@clarkhill.com,Nathan.Moulton@maine.gov,Robert.Elder@maine.gov

Dennis L. Morgan on behalf of Creditor Fred's Plumbing & Heating, Inc.

dmorgan@coopercargillchant.com, hplourde@coopercargillchant.com

Stephen G. Morrell, Esq. on behalf of U.S. Trustee Office of U.S. Trustee

stephen.g.morrell@usdoj.gov

Kameron W. Murphy, Esq. on behalf of Creditor Midwest Railcar Corporation

kmurphy@tuethkeeney.com, gcasey@tuethkeeney.com

Office of U.S. Trustee

ustpreion01.po.ecf@usdoj.gov

Richard P. Olson, Esq. on behalf of Creditor Informal Committee of Quebec Claimants

rolson@perkinsolson.com, jmoran@perkinsolson.com;lkubiak@perkinsolson.com

Jeffrey T. Piampiano, Esq. on behalf of Interested Party XL Insurance Company, Ltd.

jpianpiano@dwmlaw.com, aprince@dwmlaw.com;hwhite@dwmlaw.com

Jennifer H. Pincus, Esq. on behalf of U.S. Trustee Office of U.S. Trustee

Jennifer.H.Pincus@usdoj.gov

William C. Price on behalf of Creditor Maine Department of Transportation

wprice@clarkhill.com, rhotaling@clarkhillthorpreed.com

Joshua Aaron Randlett on behalf of Defendant Travelers Property Casualty Company of America
a/k/a) Travelers Insurance Company

jrandlett@rwlb.com, kmorris@rwlb.com

Joshua Aaron Randlett on behalf of Interested Party Travelers Property Casualty Company of America

jrandlett@rwl.com, kmorris@rwl.com

Elizabeth L. Slaby on behalf of Creditor Maine Department of Transportation
bslaby@clarkhillthorpreed.com

John Thomas Stemplewicz on behalf of Creditor United States of America
john.stemplewicz@usdoj.gov

Deborah L. Thorne, Esq. on behalf of Creditor GATX Corporation
deborah.thorne@btlaw.com

Timothy R. Thornton on behalf of Creditor Canadian Pacific Railway Co.
pvolk@briggs.com

Mitchell A. Toups on behalf of Interested Party Wrongful Death, Personal Injury, Business,
Property and Environmental Clients as of September 1, 2013
matoups@wgttlaw.com, jgordon@wgttlaw.com

Pamela W. Waite, Esq. on behalf of Creditor Maine Revenue Services
pam.waite@maine.gov

Jason C. Webster, Esq. on behalf of Creditor Estates of David Lacroix Beaudoin
jwebster@thewebsterlawfirm.com,
dgarcia@thewebsterlawfirm.com;hvicknair@thewebsterlawfirm.com

William H. Welte, Esq. on behalf of Creditor Atlantic Specialty Insurance Company
wwelte@weltelaw.com

Elizabeth J. Wyman, Esq. on behalf of Creditor Maine Department of Transportation
liz.wyman@maine.gov, eve.fitzgerald@maine.gov

Served on January 28, 2014 via First Class Mail

Wystan M. Ackerman, Esq.
Stephen Edward Goldman, Esq.
Michael R. Enright, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103

Craig D. Brown, Esq.
Peter J. Flowers, Esq.
Meyers & Flowers, LLC
3 North Second Street, Suite 300
St. Charles, IL 60174

Luc A. Despina, Esq.
Paul Hastings, LLP
75 East 55th Street
New York, NY 10022

Eric M. Hocky, Esq.
Clark Hill Thorp Reed
2005 Market Street – Suite 1000
Philadelphia, PA 19103

Irving Paper Limited
Irving Paper & Pulp, Limited
J.D. Irving, Limited
c/o Pierce Atwood LLP
Attn: Keith J. Cunningham, Esq.
254 Commercial Street
Portland, ME 04101

Robert J. Keach, Esq.
Bernstein Shur Sawyer & Nelson
100 Middle Street
P.O. Box 9729
Portland, ME 04104

Virginia Strasser, Esq.
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

Allison M. Brown
Diane P. Sullivan
Weil, Gotshal & Manges LLP
301 Carnegie Center, Suite 303
Princeton, NJ 08540

Verrill & Dana LLP
One Portland Square
P.O. Box 586
Portland, ME 04112-0586

Michael S. Wolly, Esq.
Zwerdling, Paul, Kahn & Wolly, PC
1025 Connecticut Ave., N.W.
Washington, DC 20036

Steven J. Boyajian
Robinson & Cole LLP
One Financial Plaza, Suite 1430
Providence, RI 02903

Stefanie Wowchuck McDonald
Alan S. Gilbert
233 South Wacker Drive, Suite 7800
Chicago, IL 60606

Arvin Maskin
Victoria Vron
Marcia L. Goldstein
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Dennis M. Ryan, Esq.
Faegre Baker Daniels LLP
90 South 7th St Ste 2200
Minneapolis, MN 55402-3901

Terence M. Hynes, Esq.
Sidley Austin LLP
1501 K. Street N.W.
Washington, DC 20005

Robert Jackstadt
Tueth, Keeney, Cooper, Mohan &
Jackstadt
101 West Vandalia, Suite 210
Edwardsville, IL 62025

Thomas A. Labuda,
Matthew E. Linder
Jeffrey C. Steen
Sidley Austin, LLP
One South Dearborn
Chicago, IL 60603

Robert D. Thomas
49 Park Street
Dexter, ME 04930

Frederick J. Williams
74 Bellevue Street
Compton, QU J0B 1L0

Daniel Aube
308 St-Lambert Street
Sherbrooke, QU J1C0N9

Shaw Fishman Glantz & Towbin LLC
321 N Clark St
Chicago, IL 60654