

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re)	
)	Case No. 13-10670
MONTREAL MAINE & ATLANTIC)	
RAILWAY, LTD.)	Chapter 11
)	
Debtor.)	
)	

**RESPONSE OF NEW BRUNSWICK SOUTHERN RAILWAY COMPANY LIMITED
AND MAINE NORTHERN RAILWAY COMPANY TO THE ESTATE
REPRESENTATIVE’S MOTION FOR EXPEDITED HEARING AND SHORTENED
OBJECTION PERIOD WITH RESPECT TO THE ESTATE REPRESENTATIVE’S
MOTION TO STAY PROCEEDINGS AND DISCOVERY IN RELATION TO
OBJECTION TO PROOFS OF CLAIM FILED BY NEW BRUNSWICK SOUTHERN
RAILWAY COMPANY AND MAINE NORTHERN RAILWAY COMPANY LIMITED
ON THE BASIS THAT CERTAIN OF SUCH CLAIMS ARE DUPLICATIVE OF
OTHERS, AND SUCH OTHERS ARE IMPROPERLY ASSERTED AS
ADMINISTRATIVE AND/OR PRIORITY CLAIMS**

New Brunswick Southern Railway Company Limited (“NBSR”) and Maine Northern Railway Company (“MNR” and together with NBSR the “Irving Railroads”), respectfully submit this response (the “Response”) to the Motion for Expedited Hearing and Shortened Objection Period with Respect to Estate Representative’s Motion to Stay Proceedings and Discovery in Relation to Objection to Proofs of Claim Filed by New Brunswick Southern Railway Company Limited and Maine Northern Railway Company on the Basis that Certain of Such Claims Are Duplicative of Others, and Such Others Are Improperly Asserted As Administrative and/or Priority Claims [D.E. 2286] (the “Motion to Expedite”) of, Robert J. Keach, the estate representative for the post effective date estate of Montreal Maine & Atlantic Railway, Ltd., (the “Estate Representative”).

The Irving Railroads are filing a separate response (the “**Response to the Stay Motion**”) in opposition to the Estate Representative’s Motion (the “**Stay Motion**”) to Stay Proceedings and Discovery in Relation to Objection to Proofs of Claim Filed by New Brunswick Southern Railway Company Limited and Maine Northern Railway Company on the Basis that Certain of Such Claims Are Duplicative of Others, and Such Others Are Improperly Asserted As Administrative and/or Priority Claims. The Irving Railroads do not object to the Estate Representative’s Motion to Expedite so long as they are relieved of the requirement in Local Bankruptcy Rule 9013-1(f) to also file an answer to the Stay Motion addressing each of the averments specified therein.

Respectfully submitted,

Dated: February 8, 2017

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MAINE**

In re:) **Chapter 11**
)
MONTREAL MAINE & ATLANTIC) **Case No. 13-10670**
RAILWAY, LTD.)
)
Debtor.)

CERTIFICATE OF SERVICE

I, Michelle S. Pottle, an employee of Pierce Atwood LLP, being over the age of 18, hereby certify that on the date set forth below I caused a copy of the Response of New Brunswick Southern Railway Company Limited and Maine Northern Railway Company to the State Representative’s Motion for Expedited Hearing and Shortened Objection Period with Respect to the State Representative’s Motion to Stay Proceedings and Discovery in Relation to Objection to Proofs of Claim Filed by New Brunswick Southern Railway Company and Maine Northern Railway Company Limited on the Basis that Certain of Such Claims are Duplicative of Others, and Such Others are Improperly Asserted as Administrative and/or Priority Claims, to be served upon the parties indicated on the service list attached hereto in the manner described on said service list.

Dated: Portland, Maine
February 8, 2017

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