

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

<p>In Re:)) MONTREAL MAINE & ATLANTIC) RAILWAY, LTD.,)) Debtor.)</p>	<p>Chapter 11 Case No. 13-10670 (LHK)</p>
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**RESPONSE OF THE PROVINCE OF QUEBEC
TO AUGUST 5, 2014 ORDER TO SHOW CAUSE WHY THE REQUEST
FOR A JOINT HEARING SHOULD NOT BE DENIED**

Now comes the Province of Quebec (the “Province”), by its attorney¹ and responds to this Court’s Order to Show Cause Why the Request for a Joint Hearing Should Not be Denied dated August 5, 2014 (the “Order to Show Cause”) and respectfully states as follows:

1. The Province is a political body existing under the laws of Quebec.
2. The Province was listed in the Debtor’s schedules and statements as a creditor; however, the Province has not previously entered an appearance in this case and the Province is not on this Court’s list of recipients of electronic filing.
3. The Province is an active participant in the concurrent proceeding under Canada’s Companies’ Creditors Arrangement act, R.S.C. 1985, c. C-36, as amended (the “Canadian Proceeding”) in the Superior Court for the Province of Quebec, District of St. Francois for the Debtor’s Canadian affiliate (“MM&A Canada”) (the “Canadian Court”).
4. On July 18, 2014, the United States of America, through the Department of Transportation, Federal Railroad Administration (the “RFA”) filed with this

¹ The appearance of the Province and undersigned counsel in this case is limited specifically to the issues raised in the Order to Show Cause.

Court a Motion for an Order (1) Determining the Allocation of the Purchase Price for the Debtor's Assets and (2) Enforcing the Carve-Out (the "Allocation Motion"). The objection deadline for the Allocation Motion was August 1, 2014 with a hearing date of August 19, 2014.²

5. The Province has a significant interest in the outcome of the Allocation Motion, which would have the impact of finally allocating the purchase price of the assets of the MM&A Canada and the Debtor between this estate and the estate of MM&A Canada. Earlier in the case, the Province, the Trustee, and the Canadian Monitor engaged in communications which noted and preserved the Province's ability to participate in any hearing on the allocation issue.
6. The Allocation Motion was not served upon the Province and the Province obtained it through the courtesy of counsel to other parties in this case who received electronic notice.
7. Shortly after receipt of a copy of the Allocation Motion, and prior to the expiration of the objection period, Louise Comtois, counsel for the Province in the Canadian Proceeding, notified Canadian counsel for the FRA that (1) the Province believed that the Allocation should be subject to a joint hearing pursuant to the Cross Border Insolvency Protocol, (2) a continuance of that hearing to mid-September, 2014 was warranted, and (3) the Province would not agree to the proposed allocation reflected in the Allocation Motion.
8. The FRA concurred with the Province's position (with respect to the adjournment of the Allocation Motion and the holding of a joint hearing) and shortly thereafter, on July 29, 2014, the FRA filed with this Court, the United

² Although the Allocation Motion requests relief under "...sections 105, 361, 363(b) and 506(c)..." of the Bankruptcy Code the objection period was only 14 days after filing. Bankruptcy Rule 2002(a) requires twenty-one day notices of the proposed use, sale or lease of property of the estate such as a motion brought under Bankruptcy Code Section 363(b) and Local Bankruptcy Rule 9013-1 required that the objection deadline for such motions be not less than twenty one days after filing.

States of America's Motion for an Order Setting a Joint Hearing on [the Allocation Motion] (the "Joint Hearing Motion").

9. The Trustee in this case did not oppose the relief requested in the Joint Hearing Motion.
10. The Wheeling & Lake Erie Railway Company ("Wheeling") filed an objection to the Allocation Motion.
11. The Province reasonably understood (and communicated that understanding to Canadian counsel to the FRA) that the filing of the Joint Hearing Motion effectively superseded any objection deadline relating to the Allocation Motion and, accordingly, did not file a response or objection to the Allocation Motion.
12. After this Court entered the Order to Show Cause, FRA's counsel informed the Province that the FRA would not respond to the Order to Show Cause.
13. The Province submits that "cause" exists to grant the relief requested in the Joint Hearing Motion for the following reasons:
 - (a) Holding such a hearing is consistent with the principles of comity reflected in the Cross Border Insolvency Protocol, particularly with respect to the facilitation of "...fair, open and efficient administration of the proceeding..." Moreover, both the Court and the Canadian Court should decide the Allocation Motion because the assets to be allocated are those of MM&A Canada and the Debtor. The Province will shortly file (and serve) an allocation motion and a related motion for a joint hearing in the Canadian Proceeding.
 - (b) The failure of the Province to file a timely response to the Allocation Motion was predicated upon its reasonable understanding of the effect of

the Joint Hearing Motion and the consent of the FRA and the Trustee to that motion.

- (c) No party will be prejudiced.
- (d) The important interests of the Province and its citizens in the results of the Allocation Hearing will be protected.
- (e) Granting the Joint Hearing Motion will honor the professional courtesy, integrity and good faith of the parties.

14. In the alternative, if the Court rejects the request to hold a joint hearing on the Allocation Motion, the Province respectfully requests that the Court continue the hearing on the Allocation Motion and extend the time within which the Province may file its objection if necessary.

15. This pleading has been served upon Trustee, counsel to the FRA and those parties who are on this Court's electronic service list.

WHEREFORE, the Province respectfully requests that the Court (i) determine that cause exists to grant the relief requested in the Joint Hearing Motion in its entirety, (ii) set an objection deadline for the Allocation Motion no earlier than 7 days prior to the joint hearing on such motion, or in the alternative (iii) extend the time for the Province to object to the Allocation Motion with a continuation of the hearing date on the Allocation Motion, and (iv) that the grant such other relief as may be just.

Dated: August 8, 2014

Respectfully submitted,

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

_____)	
In Re:)	
)	
MONTREAL MAINE & ATLANTIC)	Chapter 11
RAILWAY, LTD.,)	Case No. 13-10670 (LHK)
)	
Debtor.)	
_____)	

CERTIFICATE OF SERVICE

I, Richard P. Olson, being over the age of eighteen and an employee of Perkins Olson, P.A. of Portland, Maine hereby certify that on August 8, 2014, I electronically filed *RESPONSE OF THE PROVINCE OF QUEBEC TO ORDER TO SHOW CAUSE WHY THE REQUEST FOR A JOINT HEARING SHOULD NOT BE DENIED*, which were received by the below individuals indicated as receiving service via the “ECF Filing” system and pre-paid U.S. First Class Mail.

Dated: August 8, 2014

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