

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

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

**SUPPLEMENTAL LIMITED OBJECTION OF MAINE NORTHERN RAILWAY
COMPANY AND NEW BRUNSWICK SOUTHERN RAILWAY COMPANY LIMITED
TO THE FIRST AMENDED DISCLOSURE STATEMENT FOR THE TRUSTEE’S
PLAN OF LIQUIDATION DATED JULY 7, 2015**

Maine Northern Railway Company (“Maine Northern”) and New Brunswick Southern Railway Company Limited (“New Brunswick” and collectively with Maine Northern, the “Irving Railroads”) hereby submit this supplemental limited objection (the “Objection”) to the First Amended Disclosure Statement for the Trustee’s Plan of Liquidation dated July 7, 2015 [Docket # 1497] (the “First Amended Disclosure Statement”).

BACKGROUND AND FACTS

1. On or about August 7, 2013 (the “Petition Date”), Montreal, Maine & Atlantic Railway, Ltd. (“MMA”) filed a petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

2. During the six month period immediately preceding the Petition Date, the Irving Railroads provided essential services to MMA that enabled MMA to conduct its rail operations. As a result, at the time MMA filed its chapter 11 petition, Maine Northern and New Brunswick had significant claims against the MMA bankruptcy estate which are entitled to priority under section 1171(b) of the Bankruptcy Code.

3. On March 31, 2015, the Trustee filed the Trustee's Plan of Liquidation dated March 31, 2015 [Docket # 1384] (the "Original Liquidating Plan") and a Disclosure Statement for the Trustee's Plan of Liquidation dated March 31, 2015 [Docket # 1385] (the "Original Disclosure Statement").

4. The Original Liquidating Plan provided that claims arising under section 1171(b) would be treated as Allowed Administrative Expense Claims, to the extent allowed by a final order of the Bankruptcy Court, and would be paid in full in cash. *See* Original Liquidating Plan, Sections 2.1(b) and (c).

5. On May 18, 2015, the Trustee filed his Motion for an Order (I) Approving Proposed Disclosure Statement; (II) Establishing Notice, Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; and (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan [Docket # 1432].

6. On July 7, 2015, the Trustee filed the Trustee's First Amended Plan of Liquidation dated July 7, 2015 [Docket # 1495] (the "First Amended Liquidating Plan") and the First Amended Disclosure Statement in support thereof.

7. The First Amended Liquidating Plan now provides that instead of treatment as Administrative Expense Claims to be paid in full and in cash, claims arising under section 1171(b) of the Bankruptcy Code will be treated as Class 7 Priority Claims, junior in priority to all other Class 7 Priority Claims, and, if allowed, will be paid in such amount and *upon such terms as the Bankruptcy Court shall determine*. *See* Section 2.4 and 4.7(b) of the First Amended Liquidating Plan.

8. Although the First Amended Liquidating Plan fails to provide that holders of allowed claims arising under section 1171(b) of the Bankruptcy Code will receive payment in

full, in cash, following the allowance of their claims, the Plan designates such claims as being unimpaired and provides that the holders of such claims are not entitled to vote to accept or reject the plan. *See* Section 4.7(a) of the First Amended Liquidating Plan.

GROUND FOR OBJECTION

9. In order to satisfy the requirement under section 1125(b) of the Bankruptcy Code that a disclosure statement contain “adequate information,” it is beyond question that statements purporting to explain the law governing the treatment of claims under a plan must be accurate. *See B&M Linen Corp. v. 220 Laundry LLC (In re B&M Linen Corp.)*, No. 12-11560, 2013 Bankr. LEXIS 2382, at *21 (Bankr. S.D.N.Y. July 12, 2013) (“The information must obviously be accurate to the best of the Plan Proponent’s knowledge.”); *In re McGoey*, No. 10-70004, 2011 Bankr LEXIS 1716, at *2 (Bankr. N.D. Cal. May 10, 2011) (“For information to be ‘adequate,’ it must be accurate and intelligible as well as sufficient in detail.”). In the First Amended Disclosure Statement, the Trustee asserts that claims arising under section 1171(b) of the Bankruptcy Code are, “as a matter of law,” junior in priority to all other priority claims. *See* First Amended Disclosure Statement at p.51. The Trustee’s only support for that assertion is a passage from the *Collier* bankruptcy treatise which states, *without citation to any authority, much less case authority*, that “[i]n general, six-month claims should be below [in priority] all of the section 507 priorities.” *See* First Amendment Disclosure Statement at pp. 47-48, note 10, *citing* 8 *Collier on Bankruptcy* ¶ 1171.02 pp. 107-9 [16th ed. 2010].

10. The fact is, however, that the law in this Circuit is crystal clear on the issue. The Court of Appeals for the First Circuit specifically held in *In re Boston & Maine Corporation*, 634 F.2d 1359, 1378-79 (1st Cir, 1980), *cert. denied*, 450 U.S. 982, 101 S. Ct. 1518, 67 L.Ed.2d 817 (1981) that in a railroad reorganization case:

If a claim has the generally accepted characteristics of a six month claim ... that is (1) it represents a current operating expense necessarily incurred, (2) was incurred within six months before the reorganization petition was filed, and (3) the goods or services were delivered in the expectation that they would be paid for out of current operating revenues of the railroad, and not in reliance on the road's general credit, it will inevitably be for an expense indistinguishable from and essentially contemporaneous with expenses paid by the railroad before reorganization, and *will be indistinguishable from currently paid administration expenses*. (emphasis supplied; footnote omitted)¹

11. The touchstone for addressing the treatment of six month claims in a railroad reorganization is, according to the First Circuit, "equality of treatment." As the Court noted in *Boston & Maine*:

That equality is readily achieved by recognizing administration expenses as extending backward to the period preceding reorganization to the extent necessary to assure that there is continuity in the payment of indispensable operating expenses without reference to the date the petition is filed so long as the current expenses of the pre-reorganization period that are brought forward for payment conform to the strict standard established for administration expenses of the current operating class, and are not so dated as to forbid the conclusion that they are in fact current. The inequity in treatment arising out of the accidental circumstance of non-payment before the filing of the petition is eliminated.

Id. at 1379.

12. Under settled First Circuit law, allowed six month claims that arise under section 1171(b) of the Bankruptcy Code are to be treated as administrative expenses, and must be paid as such. The First Amended Liquidating Plan fails to adhere to that requirement. At this stage of the proceeding, at the very least, the First Amended Disclosure Statement should be modified to correctly state the law in the First Circuit that governs the treatment of six month claims and

¹ *Boston & Maine* involved a railroad reorganization under section 77 of the Bankruptcy Act of 1898, 11 U.S.C. §205. The priority accorded "six month claims" was premised upon the provisions of section 77(b) of the Act. The First Circuit noted in its opinion that the language of section 1171(b) of the current Bankruptcy Code is the "same in substance as that of Section 77(b)." *Boston & Maine* at 1366, note 15.

explain that the Trustee's First Amended Liquidating Plan does not conform with such law.

13. The foregoing is without prejudice to the Irving Railroads' right to object to confirmation of the First Amended Liquidating Plan on any and all grounds, including without limitation, (i) the failure to classify the Irving Railroads' section 1171(b) claims as administrative expenses that, to the extent allowed, will be paid in full, in cash, following the effective date of confirmation of the Plan, (ii) the improper subordination of the Irving Railroads' section 1171(b) claims to all other priority claims, (iii) the failure to otherwise provide that the Irving Railroads' section 1171(b) claims, to the extent allowed, will be paid in full, in cash, following the effective date of the Plan, and (iv) the failure to accord the Irving Railroads the opportunity to vote to accept or reject the Plan to the extent their section 1171(b) claims are included in Class 7, but are not, upon allowance of such claims, to be paid in full and in cash following the effective date of the Plan.

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WHEREFORE, based on the foregoing, the Irving Railroads respectfully request that the Court require, as a condition to approval of the First Amended Disclosure Statement, that the Trustee modify the Disclosure Statement to correctly state the law governing the treatment of six month claims arising under section 1171(b) of the Bankruptcy Code, and for such other relief as the Court may find to be appropriate.

Respectfully submitted,

Dated: July 14, 2015

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CERTIFICATE OF SERVICE

I, Lori Hawe, an employee of Pierce Atwood LLP, being over the age of 18, hereby certify that on the date set forth below I caused copies of the Supplemental Limited Objection of Maine Northern Railway Company and New Brunswick Southern Railway Company Limited to the First Amended Disclosure Statement for the Trustee's Plan of Liquidation Dated July 7, 2015, to be served upon the parties indicated on the service list attached hereto in the manner described on said service list.

Dated: Boston, MA
July 14, 2015

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