

of Counsel

FRANK G. FELKAI, Q.C. (Retired)
ALLAN C. HUTCHINSON

in association with

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
SAN FRANCISCO | NEW YORK | NASHVILLE

BY EMAIL: MARTINE.GIRARD@JUDEX.QC.CA

June 3, 2015

Honorable Gaétan Dumas, J.C.S.
Coordonnateur Des Districts De St-François, Bedford Et Mégantic
Palais De Justice
375, Rue King Ouest
Sherbrooke QC J1H 6B9

RE: C.S. DIVISION COMMERCIALE – SAINT-FRANÇOIS: 450-11-000167-134
Dans l'affaire de l'arrangement de:
MONTRÉAL, MAINE & ATLANTIC CANADA CO. / (MONTRÉAL, MAINE &
ATLANTIC CANADA CIE) (ci-après "MMA")
Motion of the Class Representatives for the Filing of Additional Claims

Dear Mr. Justice Dumas,

I am writing further to your judgment, released on May 27, 2015, in respect of the Class Representatives' motion for leave to file additional claims. Specifically, we ask that you clarify or reconsider certain aspects of your judgment described below.

We are proposing address these matters informally, through correspondence, as we are mindful of the limited availability of court time and other resources, and to avoid expense. If Your Lordship requires a formal motion in order to consider these matters, we are, of course, at your disposal.

A. The Claims of Minors Addressed in their Parents' Affidavits

In your judgment, you allowed the claims of the 127 individuals who delivered affidavits. A number of those affidavits provided evidence not only in support of a claim on behalf of the affiant, but also in support of a claim on behalf of children under the affiant's care. In most cases, the claims of these children were either referenced in, or appended to, affidavits filed by their parents.

Inasmuch as your judgment does not expressly address the issue of claims presented on behalf of these minors, I would respectfully ask for clarification regarding the treatment of these claims. I respectfully submit that the same principles that led you to admit the claims of the 127 affiants also apply to the claims of the children under their care. The claims of these minors are denoted in orange on Exhibit MF-4. The names of the children and the names of the affiants supporting their claims are attached as "Schedule A" to this letter.

B. Affidavits Not Available at the Hearing of the Motion

Class Counsel have now received twelve additional affidavits in support of claims falling into the category of June 2014 Claims. As we explained at the hearing of the motion, although we had interviewed these individuals, we were not able to subsequently meet with them to swear their affidavits prior to the hearing of the motion. We have now obtained their affidavits and they are attached in PDF form: originals will be filed with the court. These affidavits are for the following individuals:

1. Karine Blanchette;
2. Cynthia Beliveau;
3. Chantal Boucher;
4. Jean-Francois Genesse;
5. Estelle Couture;
6. Alexandre Lapierre;
7. Simon Giroux;
8. Michelle Dumont Roy;
9. Nadia Ouellet;
10. Martin Carrier;
11. Patrick Carrier; and
12. Isabelle Hallé

In the circumstances, we ask that you reconsider your decision in respect of these 12 individuals and admit their claims as well.

C. Counsel of Record

As a point of order, I note that the judgment does not reflect my attendance, although I argued the motion.

D. Report in Respect of Additional Claims

Finally, I take this opportunity to report to the court with respect to the status of the additional 300-400 claimants that were not before the Court but who have most recently registered on the Class Action website, together with other late-comers (the "Additional Claimants").

Class counsel have dedicated a team of individuals to gathering information, and where advisable possibly affidavits, from this group. Also, to better manage the process, we have stopped accepting registrations through the class action web site, and we are now requiring class members wishing to advance a claim or register their interest in the class action to contact Me Larochelle's office. However, having regard to the number of motions pending before this court, the proximity of the meeting date, ongoing discussions among stakeholders in respect of a variety of matters, and the numerous inquiries that we are receiving from Class Members

regarding the Plan and the information package distributed by the Monitor, we do not expect that it will be possible to address the issues raised by the Additional Claimants prior to the June 9, 2015 creditors meeting or even prior to or at the sanction hearing.

In these circumstances, to ensure transparency and to properly balance the interests of all Class Members, we will be communicating with Class Members having proven claims, prior to the creditors meeting, to alert them to the fact that their current projected recoveries under the Plan may be diluted in the event that court exercises its discretion to admit the claims of the Additional Claimants. Although, at this time, we are not formally seeking any relief in respect of these matters, we nonetheless thought it prudent to report on our course of conduct in light of the evolving nature of the case.

Respectfully,



Joel P. Rochon

Schedule "A"

Child	Affiant
1. Blais, Lucas	Blais, Marc-Andre
2. Blais, William	
3. Bolduc, Remi	Bolduc, Ricky
4. Brousseau, Heidi	Blais, Nathalie
5. Carrier, Florence	Dumont-Roy, Michelle
6. Corriveau Paradis, Florence;	Corriveau, Marlene
7. Cote, Alyson	Cote, Serge
8. Gagnon, Amelie	Gagnon, Sylvain
9. Gagnon, Jean-simon	
10. Gagnon, Pierre-Olivier	
11. Gilbert, Laurie	Gilbert, Jean-Francois
12. Girard, Lily-Ann	Fortin, Kathy Ruck
13. Guimond Demers, Damien	Demers, Frederic
14. Halle, Arianne	Dulac, Jessy
15. Halle, Delphine	
16. Halle, Sarah-Maude;	
17. Laflamme, Amelie	Veilleux, Sandra
18. Laliberte, Eden	Gaucher, Annick
19. Laliberté, Eli	
20. Laliberté, Emrick	
21. Lapierre, Mary-Ann	Fortin, Kathy Ruck
22. Lauzon, Hugo	Lafreniere, Lucie
23. Mercier Fortin, Jolyane	Mercier, Joanne
24. Moffatt, Anais	Lemieux, Annick
25. Moffatt, Angélique	
26. Moffatt, Zoelie	
27. Morin, Kevi;	Fortin, Nancy
28. Morin, Rebeka	
29. Paradis, Xavier Corriveau	Marlene, Corriveau

30. Pelchat, Andy 31. Pelchat, Katrina	Leclerc (Pelchat) Shirley
32. Plante, Anthony	Plante, Jean-Francois
33. Rouillard Bilodeau, Jessy	Rouillard, Andre
34. Roy, Emmy 35. Roy, Timmy	Ouellet, Nadia
36. Therrien, Nathaniel	Mercier, Joanne