

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MAINE

In re:

MONTREAL, MAINE & ATLANTIC  
RAILWAY, LTD.,

Debtor.

Bk. No. 13-10670  
Chapter 11

ROBERT J. KEACH, solely in his capacity as  
the chapter 11 trustee for MONTREAL,  
MAINE & ATLANTIC RAILWAY, LTD.,

Plaintiff

v.

WORLD FUEL SERVICES CORPORATION,  
WORLD FUEL SERVICES, INC.,  
WESTERN PETROLEUM COMPANY,  
WORLD FUEL SERVICES, CANADA, INC.,  
AND PETROLEUM TRANSPORT  
SOLUTIONS, LLC, CANADIAN PACIFIC  
RAILWAY COMPANY, AND IRVING OIL  
LIMITED

Defendants.

Adversary Proceeding No. 14-1001

**ORDER GRANTING UNOPPOSED MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT**

This matter having come before the Court on the Motion for Leave to File Second Amended Complaint (the "Motion"), filed by plaintiff Robert J. Keach, solely in his capacity as the chapter 11 trustee (the "Trustee") of Montreal, Maine & Atlantic Railway, Ltd.; and sufficient notice of the Motion having been given; the Court having reviewed and considered the unopposed Motion,

the Court hereby **ORDERS**, **ADJUDGES** and **DECREEES** as follows:<sup>1</sup>

1. The Motion is granted in its entirety.
2. The Trustee shall file and serve the Second Amended Complaint substantially in the form attached as Exhibit A to the Motion.

Dated: May 18, 2015

/s/ Peter G. Cary

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The Honorable Peter G. Cary  
United States Bankruptcy Judge for the  
District of Maine

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Certificate of Notice Page 3 of 4  
United States Bankruptcy Court  
District of MaineKeach,  
Plaintiff

Adv. Proc. No. 14-01001-PGC

World Fuel Services Corporation,  
Defendant**CERTIFICATE OF NOTICE**

District/off: 0100-1

User: kford  
Form ID: pdf900Page 1 of 2  
Total Noticed: 9

Date Rcvd: May 18, 2015

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 20, 2015.

aty +Lazar Pol Raynal, McDermott Will & Emery, 227 West Monroe Street, Suite 4700,  
Chicago, IL 60606-5096

smg +State of Maine, Bureau of Revenue Services, Compliance Division Bankruptcy Unit,  
P.O. Box 1060, Augusta, ME 04332-1060

dft +Petroleum Transport Solutions, LLC, Attn: Assistant General Counsel, 9800 NW 41 Street,  
Suite 400, Miami, FL 33178-2980

pla Robert J. Keach, Bernstein, Shur, Sawyer & Nelson, P.A., 100 Middle Street, P.O. Box 9729,  
Portland, ME 04104-5029

dft +Western Petroleum Company, Attn: Assistant General Counsel, 9800 NW 41 Street, Suite 400,  
Miami, FL 33178-2980

dft +World Fuel Services Corporation, Attn: Assistant General Counsel, 9800 NW 41 Street,  
Suite 400, Miami, FL 33178-2980

dft +World Fuel Services, Canada, Inc., Attn: Assistant General Counsel, 9800 NW 41 Street,  
Suite 400, Miami, FL 33178-2980

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

ust +E-mail/Text: USTPREGION01.PO.ECF@USDOJ.GOV May 18 2015 20:46:34 Office of U.S. Trustee,  
537 Congress Street, Suite 300, Portland, ME 04101-3490

ust +E-mail/Text: USTPREGION01.PO.ECF@USDOJ.GOV May 18 2015 20:46:34 Office of the U.S. Trustee,  
537 Congress Street, Portland, ME 04101-3490

TOTAL: 2

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

dft\* +World Fuel Services, Inc., Attn: Assistant General Counsel, 9800 NW 41 Street, Suite 400,  
Miami, FL 33178-2980

TOTALS: 0, \* 1, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 20, 2015

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 18, 2015 at the address(es) listed below:

Aaron P. Burns on behalf of Defendant Canadian Pacific Railway Corporation  
aburns@pearcedow.com, rpearce@pearcedow.com

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

D. Sam Anderson, Esq. on behalf of Plaintiff Robert J. Keach sanderson@bernsteinshur.com,  
acummings@bernsteinshur.com;astewart@bernsteinshur.com;kquirk@bernsteinshur.com;kbigelow@bernsteinshur.com

Fred W. Bopp III,, Esq. on behalf of Defendant Irving Oil Limited fbopp@perkinsthompson.com,  
lwliver@perkinsthompson.com;sdoil@perkinsthompson.com;mmelson@perkinsthompson.com

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

Jay S. Geller on behalf of Defendant Petroleum Transport Solutions, LLC  
jgeller@jaysgellerlaw.com

Jay S. Geller on behalf of Defendant World Fuel Services Corporation jgeller@jaysgellerlaw.com

Jay S. Geller on behalf of Defendant World Fuel Services, Inc. jgeller@jaysgellerlaw.com

Jay S. Geller on behalf of Defendant Western Petroleum Company jgeller@jaysgellerlaw.com

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jgeller@jaysgellerlaw.com

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

Joshua R. Dow, Esq. on behalf of Defendant Canadian Pacific Railway Corporation  
jdow@pearcedow.com, rpearce@pearcedow.com

District/off: 0100-1

User: kford  
Form ID: pdf900

Page 2 of 2  
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The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Paul McDonald on behalf of Plaintiff Robert J. Keach pmcdonald@bernsteinshur.com,  
jsmith@bernsteinshur.com;astewart@bernsteinshur.com  
Paul Joseph Hemming on behalf of Defendant Canadian Pacific Railway Corporation  
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acummings@bernsteinshur.com;astewart@bernsteinshur.com;kquirk@bernsteinshur.com  
Timothy J. McKeon, Esq. on behalf of Plaintiff Robert J. Keach tmckeon@bernsteinshur.com,  
kquirk@bernsteinshur.com;astewart@bernsteinshur.com;kbigelow@bernsteinshur.com  
Timothy R. Thornton on behalf of Defendant Canadian Pacific Railway Corporation  
pvolk@briggs.com

TOTAL: 17