

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL, MAINE & ATLANTIC  
RAILWAY, LTD.,

Debtor.

Case No. 13-10670  
Chapter 11

**STIPULATION AND AGREED ORDER RELATING TO DOCKET NO. 2180**

The Family Members<sup>1</sup> and Ms. Nadeau and her Canadian attorneys (together with the Family Members, the Parties) hereby stipulate and agree as follows:

WHEREAS, on June 29, 2016, the Family Members filed the *Motion of Family Members for Order: (I) Enforcing Confirmed Chapter 11 Plan; (II) Holding Contemnors in Civil Contempt; and (III) Imposing Sanctions* [Docket No. 2180] (the Motion);

WHEREAS, the United States Bankruptcy Court for the District of Maine (the Court) held hearings on the Motion on July 7, 201 and July 12, 2016;

WHEREAS, on July 14, 2016, the Court entered an order partially granting the Motion [Docket No. 2208] (the Order), whereby the Court directed (a) Ms. Nadeau and her Canadian attorneys to withdraw a motion filed in the Canadian Court, (b) the Parties to engage in dispute resolution and, if necessary, adjudication, before the WD Trustee, subject to review by the Court, and (c) the Parties to contact the Courtroom Deputy to schedule further proceedings on the Family Members' entitlement to sanctions against Ms. Nadeau and her Canadian attorneys; and

WHEREAS, following good faith negotiations, the Parties have now resolved all disputes between them that were the subject of the Motion.

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

NOW THEREFORE, the Parties stipulate and agree that the Motion is hereby withdrawn and dismissed with prejudice and with each party bearing its own costs, unless otherwise agreed in writing between the Parties.

Dated: October 10, 2016

Respectfully submitted,

/s/ Jeremy R. Fischer

Jeremy R. Fischer  
DRUMMOND WOODSUM  
84 Marginal Way, Suite 600  
Portland, Maine 04101-2480  
Telephone: (207) 772-1941  
E-mail: [jfischer@dwmlaw.com](mailto:jfischer@dwmlaw.com)

*Counsel for Josee Lajeunesse, as Estate  
Representative for Eric Pepin Lajeunesse, and  
Clermont Pepin, Josee Lajeunesse, and Yannick  
Pepin, Individually*

-and-

/s/ F. Bruce Sleeper

F. Bruce Sleeper  
JENSEN BAIRD GARDNER & HENRY  
10 Free St., P.O. Box 4510  
Portland, Maine 04112-4510  
Telephone: (207) 775-7271  
E-mail: [bsleeper@jbgh.com](mailto:bsleeper@jbgh.com)

*Counsel for Sabrina Nadeau and Her Canadian  
Attorneys*

**IT IS SO ORDERED:**

Dated:

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Hon. Peter G. Cary  
Chief United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE**

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RAILWAY, LTD.,	)	Chapter 11
	)	
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	)	
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	)	

**CERTIFICATE OF SERVICE**

I, Jeremy R. Fischer, hereby certify that true and correct copies of the Stipulation and Agreed Order Relating to Docket No. 2180 was served electronically on all persons who receive notice through the Court's CM/ECF system.

Dated at Portland, Maine, this 10<sup>th</sup> day of October, 2016.

*/s/ Jeremy R. Fischer*

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Jeremy R. Fischer  
DRUMMOND WOODSUM  
84 Marginal Way, Suite 600  
Portland, Maine 04101-2480  
Telephone: (207-772-1941)  
Email: [jfisher@dwmlaw.com](mailto:jfisher@dwmlaw.com)

*Counsel for Josee Lajeunesse, as Estate  
Representative for Eric Pepin Lajeunesse,  
and Clermont Pepin, Josee Lajeunesse, and  
Yannick Pepin, Individually*