

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NOW THEREFORE, the Parties stipulate and agree that the Motion is hereby withdrawn and dismissed with prejudice and with each party bearing its own costs, unless otherwise agreed in writing between the Parties.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  
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*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  
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*Counsel for Sabrina Nadeau and Her Canadian  
Attorneys*

**IT IS SO ORDERED:**

Dated: October 13, 2016

/s/ Peter G. Cary  
Hon. Peter G. Cary  
Chief United States Bankruptcy Judge

**Certificate of Notice Page 3 of 5**  
 United States Bankruptcy Court  
 District of Maine

In re:  
 Montreal Maine & Atlantic Railway Ltd.  
 Debtor

Case No. 13-10670-PGC  
 Chapter 11

**CERTIFICATE OF NOTICE**

District/off: 0100-1

User: kford  
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 Total Noticed: 93

Date Rcvd: Oct 13, 2016

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 15, 2016.

db #+Montreal Maine & Atlantic Railway Ltd., 15 Iron Road, Hermon, ME 04401-1179  
 aty +Alan S. Gilbert, Dentons US LLP, 233 South Wacker Drive, Suite 7800,  
 Chicago, IL 60606-6459  
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 P.O. Box 1060, Augusta, ME 04332-1060  
 cr +Clean Harbors, 42 Lonwater Dr., Norwell, MA 02061-1612  
 cr Daniel Aube, 308 St-Lambert Street, Sherbrooke, QU J1CON9, CANADA

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fa +Development Specialists, Inc., Fred Caruso, Suite 2300, 70 West Madison Street,  
Chicago, IL 60602-4250  
cr +Eastern Maine Railway Company, c/o Alan Lepene, 3900 Key Center, 127 Public Square,  
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cr +Estates of Marie Alliance, et al, c/o Murtha Cullina LLP, 99 High Street,  
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cr +Estates of Stephanie Bolduc, c/o Meyers & Flowers, LLC, 3 North Second Street, Suite 300,  
St. Charles, IL 60174-1870  
cr +Fred's Plumbing & Heating, Inc., 328 Main Street, Derby, VT 05829-9743  
cr Frederick J. Williams, 74 Bellevue Street, Compton, QU JOB 1L0, CANADA  
cr +GNP Maine Holdings, LLC, 50 Main Street, East Millinocket, ME 04430-1158  
cr +General Electric Railcar Services Corporation, c/o Pierce Atwood LLP,  
Attn: Keith J. Cunningham, 254 Commercial Street, Portland, ME 04101-1110  
intp +Irving Paper Limited, c/o Pierce Atwood LLP, Attn: Keith J. Cunningham,  
254 Commercial Street, Portland, ME 04101-1110  
intp +Irving Pulp & Paper, Limited, c/o Pierce Atwood LLP, Attn: Keith J. Cunningham,  
254 Commercial Street, Portland, ME 04101-1110  
intp +J.D. Irving, Limited, c/o Pierce Atwood LLP, 254 Commercial Street,  
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sp Kugler Kandestin LLP, c/o Gerald F. Kandestin, 1 Place Ville-Marie, Suite 2101,  
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1601 Elm St Ste 3000, Dallas, TX 75201-4761  
cr +Maine Department of Transportation, c/o Victoria Morales, 16 State House Station,  
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cr +Maine Northern Railway Company, c/o Alan Lepene, 3900 Key Center, 127 Public Square,  
Cleveland, OH 44114-1217  
cr +New Brunswick Southern Railway Company, c/o Alan R. Lepene, 3900 Key Center,  
127 Public Square, Cleveland, OH 44114-1217  
intp +Oasis Petroleum, Inc., c/o Timothy H. Norton, Esq., P.O. Box 597, Portland, ME 04112-0597  
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ea +Robert J. Keach, Bernstein Shur Sawyer & Nelson, 100 Middle Street, P.O. Box 9729,  
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cr +Shell Oil Company, c/o Jessica Lewis, Molleur Law Office, 95 Main Street,  
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cr +Sierra Liquidity Fund, LLC, 19772 MacArthur Blvd. # 200, Irvine, CA 92612-2405  
cr +Stephen C. Currie, 17 Dodlin Road, Enfield, ME 04493-4204  
intp +Surface Transportation Board, 395 E Street, S.W., Washington, DC 20423-0012  
cr Trinity Industries Leasing, Inc., c/o One City Center, Portland, ME 04101  
cr Trinity Industries, Inc., c/o One City Center, Portland, ME 04101  
cr Trinity Rail Leasing 2012 LLC, c/o One City Center, Portland, ME 04101  
cr Trinity Tank Car, Inc., c/o One City Center, Portland, ME 04101  
cr Union Tank Car Company, c/o Regan M. Haines, PO Box 7320, Portland, ME 04112-7320  
cr +United States of America, c/o Department of Justice, Civil Divisio, 1100 L Street, N.W.,  
Room 10052, Washington, DC 20005-4035  
intp +William R. Moorman, Jr., Partridge Snow & Hahn, LLP, 30 Federal Street,  
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Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
aty E-mail/Text: mhenderson@verrilldana.com Oct 13 2016 20:43:11 Verrill & Dana, LLP,  
One Portland Square, P.O. Box 586, Portland, ME 04112-0586  
aty E-mail/Text: mhenderson@verrilldana.com Oct 13 2016 20:43:11 Verrill Dana LLP,  
One Portland Square, P.O. Box 586, Portland, ME 04112-0586  
acc +E-mail/Text: dbanks@bnncpa.com Oct 13 2016 20:43:14 Baker Newman & Noyes, LLC,  
c/o Gregory Sanborn, 280 Fore Street, Portland, ME 04101-4177  
cr E-mail/Text: bankruptcy@bangor.com Oct 13 2016 20:43:19 Bangor Savings Bank, P.O.Box 930,  
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Center Beam Flat Car Company, Inc., c/o Curtis Kimball, Esq., P.O. Box 1401,  
Bangor, ME 04402-1401  
cr +E-mail/Text: ckimball@rudmanwinchell.com Oct 13 2016 20:43:30 First Union Rail,  
c/o Curtis Kimball, Esq., P.O. Box 1401, Bangor, ME 04402-1401

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

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aty ##+Diane P. Sullivan, Weil, Gotshal & Manges LLP, 301 Carnegie Center, Suite 303,  
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TOTALS: 4, \* 1, ## 2

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Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.  
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will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The  
debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

**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 309): 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: Oct 15, 2016

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 13, 2016 at the address(es) listed below:  
NONE.

TOTAL: 0