## Case 13-10670 Doc 679 Filed 02/21/14 Entered 02/21/14 18:36:45 Desc Main Document Page 1 of 2

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MAINE

In re

## MONTREAL MAINE & ATLANTIC RAILWAY, LTD.

Debtor

CHAPTER 11 CASE NO. 13-10670-LHK

## WRONGFUL DEATH CLAIMANTS' STATEMENT AND RESERVATION OF RIGHTS CONCERNING NOTICE OF AMENDED PROPOSED AGENDA FOR IN-PERSON JOINT STATUS CONFERENCE FILED BY OFFICIAL COMMITTEE OF VICTIMS

The Unofficial Committee of Wrongful Death Claimants (the "WDC Committee"), consisting of representatives of the estates of the 47 victims of the massive explosion in Lac-Mégantic, Quebec (the "Wrongful Death Claimants"), from the derailment of a train operated by the Debtor (the "Derailment"),<sup>1</sup> hereby responds to the Notice of Amended Proposed Agenda For In-Person Joint Status Conference Before U.S. And Canadian Court Pursuant To Cross-Border Insolvency Protocol (the "Proposed Agenda") Filed by Official Committee of Victims ("Victims Committee") [Docket No. 662], as follows:

The WDC Committee has engaged in discussions with the Victims Committee and anticipates that the parties will reach agreement on the agenda to be presented at the joint status conference to be held on February 26, 2014. In the event that agreement is not reached, the WDC Committee reserves the right to address the court on matters not included in the Proposed Agenda.

<sup>&</sup>lt;sup>1</sup> The victims and the representatives of their estates are listed in the Amended Verified Statement Concerning Representation of Unofficial Committee of Wrongful Death Claimants as Required by Fed. R. Bankr. P. 2019 filed by the Committee's counsel on January 28, 2014 [Docket No. 599]. Solely for the avoidance of doubt as to standing, this motion is filed on behalf of all members of the Committee as well as the Committee itself.

Dated: February 21, 2014

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