

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

In re:

MONTREAL MAINE & ATLANTIC
RAILWAY, LTD.

Debtor.

Case No. 1:13-mc-00184-NT
1:14-cv-00113-NT

Chapter 11

**PLAINTIFFS ANNICK ROY (o/b/o JEAN-GUY VEILLEUX), MARIE-JOSEE
GRIMARD (o/b/o HENRIETTE LATULIPPE) MOTION FOR LEAVE TO FILE A
MEMORANDUM IN EXCESS OF THE STATED PAGE LIMIT**

Plaintiffs Annick Roy (o/b/o Jean-Guy Veilleux), Marie-Josée Grimard (o/b/o Henriette Latulippe) hereby seek leave, pursuant to Local Rule of the United States District Court for the District of Maine 7(e), to file an opposition to the Motion of Official Committee of Victims for Order, pursuant to Court's March 23, 2015 Stay Order, to Reimpose Stay and Schedule Hearing, (the "Motion to Reimpose Stay") in excess of the stated page limitation, stating as follows:

1. On May 7, 2015, Plaintiffs filed a Notice Terminating the Stay that had been imposed in the above-captioned cases pursuant to this Court's March 23, 2015 Agreed Order Amending and Restating Consent Order Staying Proceedings Pending Appeal in 1:12-mc-00184-NT (the "Agreed Stay Order").

2. On May 18, 2015, the Official Committee of Victims appointed in the Chapter 11 case of Montreal Maine & Atlantic Railway, Ltd., filed its Motion to Reimpose Stay.

3. The Motion to Reimpose Stay raised many issues that Plaintiffs need to address. In addition to addressing the substance of the motion, Plaintiffs intend to raise Constitutional other procedural objections to the motion, including but not limited to the Committee's standing

to seek the stay; its failure to allege (or satisfy) the standards necessary for the imposition of a stay pending appeal; and its breach of fiduciary duties to unsecured creditors.

44. Plaintiffs expect that the foregoing issues will require approximately 5 written pages each on average, in addition to the recitation of the underlying procedural and factual history, which Plaintiffs believe is necessary to put the competing motions into context.

5. Given the number and nature of the issues raised in the Motion to Reimpose the Stay that Plaintiffs need to address, Plaintiffs respectfully submit that they will need more than the 10 pages allowed under Local Rule 7(e) for oppositions to non-dispositive motions.

6. Due to the importance of the issue and the complexity of the analysis required to oppose the Motion to Reimpose Stay, Plaintiffs respectfully request leave to file an opposition to the Motion to Reimpose Stay that does not exceed 25 pages.

WHEREFORE Plaintiffs respectfully request that this Court enter an Order granting Plaintiffs leave to file an opposition to the Motion to Reimpose Stay that does not exceed 25 pages.

Dated: May 27, 2015

Respectfully submitted,

ANNICK ROY (O/B/O JEAN-GUY
VEILLEUX) AND MARIE-JOSEE
GRIMARD (O/B/O HENRIETTE
LATULIPPE)

By their attorneys,

/s/ Jeffrey D. Sternklar
Jeffrey D. Sternklar
Jeffrey D. Sternklar LLC
225 Franklin Street, 26th Floor
Boston, MA 02110
617-396-4515 (telephone)
617-507-6530 (facsimile)
jeffrey@sternklarlaw.com

/s/ George W. Kurr, Jr., Esq.
Gross, Minsky & Mogul, P.A.
23 Water Street – P.O. Box 917
Bangor, ME 04402-0917
207-942-4644

CERTIFICATE OF SERVICE

I, George W. Kurr, Jr., Esquire, of the firm Gross, Minsky & Mogul, P.A., hereby certify that on May 7, 2015, I electronically filed **PLAINTIFFS ANNICK ROY (o/b/o JEAN-GUY VEILLEUX), MARIE-JOSEE GRIMARD (o/b/o HENRIETTE LATULIPPE) MOTION FOR LEAVE TO FILE A MEMORANDUM IN EXCESS OF THE STATED PAGE LIMIT** with the Court via the CM/ECF electronic filing system which will send notification of such filing to the attorneys/parties of record who have registered as CM/ECF participants.

/s/ George W. Kurr, Jr., Esq.
George W. Kurr, Jr., Esq.