

**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

**MOTION OF OFFICIAL COMMITTEE
OF VICTIMS TO FILE MEMORANDUM IN EXCESS OF STATED PAGE LIMIT**

The Official Committee of Victims (the “Victims’ Committee”) appointed in the chapter 11 case¹ of Montreal Maine & Atlantic Railway, Ltd. (the “Debtor” or “MMA”), hereby seek leave, pursuant to Local Rule of the United States District Court for the District of Maine 7(e), to file a reply to the objection (the “Objection”) of Plaintiffs Annick Roy (o/b/o Jean-Guy Veilleux), Marie-Josée Grimard (o/b/o Henriette Latulippe) filed on June 1, 2015 [Docket No. 288] and the (ii) response (the “Response”) of the Trustee filed on June 1, 2015 [Docket No. 287] to the *Motion of Official Committee of Victims for Order, Pursuant to Court’s March 23, 2015 Stay Order, to Reimpose Stay and Scheduling Hearing*, filed on May 18, 2015 [Docket No. 282] (the “Motion”) ² in excess of the stated page limitation, stating as follows:³

1. On May 7, 2015, Plaintiffs’ Counsel filed a Notice Terminating the Stay that had been imposed in the above-captioned cases pursuant to this Court’s March 23, 2015 Agreed

¹ This matter is before the District Court for the District of Maine pursuant to the chapter 11 case of Montreal Maine & Atlantic Railway, Ltd.

² Capitalized terms used in but not otherwise defined shall have the meanings ascribed to them in the Motion.

³ Given the short reply period, the Victims’ Committee filed its 11 page reply (the “Reply”) [Docket No. 289] late last night, June 3, 2015. By this motion, the Victims’ Committee seeks approval of the Reply previously filed.

Order Amending and Restating Consent Order Staying Proceedings Pending Appeal in 1:13-mc-00184-NT.

2. On May 18, 2015, the Victims' Committee filed the Motion.

3. On May 27, 2015, Plaintiffs' Counsel filed a motion seeking leave to file a memorandum in excess of stated page limits [Docket No. 283]. The Court granted such motion by an order dated May 28, 2015 [Docket No. 285].

4. On June 1, 2015, the Trustee filed the Response and Plaintiffs' Counsel filed the 25 page Objection.

5. Plaintiffs' Counsel's 25 page Objection raises several new issues and lodges numerous allegations, including, among other allegations, that the Victims' Committee lacked standing to bring the Motion and be heard, and that by seeking the relief sought in the Motion the Victims' Committee was in breach of its fiduciary duties to unsecured creditors.

6. Due to the length of the Objection and the number and nature of issues raised, the Victims' Committee is compelled to respond.

7. Given the number and nature of the issues raised in the Objection, including fundamental questions of standing, that the Victims' Committee must address, the Victims' Committee respectfully submits that they will need more than the 7 pages allowed under Local Rule 7(e) for reply memorandum.

8. Due to the number and nature of the issues raised in the Objection, the Victims' Committee respectfully request leave to file a reply memorandum of 11 pages.

WHEREFORE the Victims' Committee respectfully requests that this Court enter an Order granting the Victims' Committee leave to file a reply memorandum of 11 pages.

Dated: June 4, 2015

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Co-counsel to the Official Committee

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2015, I electronically filed the Motion of Official Committee of Victims to file Memorandum in Excess of Stated Page Limit, with the Clerk of Court using the CM/ECF system which will send notification of such filing to the parties of record who have registered as CM/ECF participants.

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