

Hearing Date: September 13, 2013
Time: 10:00 a.m.
Location: Bangor
Objection Date: September 12, 2013

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:	§	
MONTREAL MAINE & ATLANTIC	§	CHAPTER 11
RAILWAY, LTD.	§	CASE NO. 13-10670

RESPONSE OF BUSINESS CLAIMANTS, PASSION CHOCOLAT S.E.N.C., ET AL, TO QUEBEC'S MOTION TO APPOINT CREDITORS' COMMITTEE

Comes Now, Claimants, Passion Chocolat s.e.n.c., et al, to as well as numerous other property owners and business owners that are victims of the tragedy which occurred in Lac-Megantic, Quebec, on July 6, 2013 (See Exhibit "A"), and they do not object to Quebec's Motion for Appointment of Creditors' Committee as long as said attorneys in said Motion represent business and environmental claims for Quebec and the City of Lac-Megantic. Counsel herein does object to the purported class attorneys attempting to form a committee for any wrongful death claimants, injured plaintiffs, or anyone else (business or other claims), as most Claimants are represented by U.S. counsel and are seeking restitution, or will, for their injuries and damages in the United States, not Quebec. In that regard, no class representative committee member should be recognized as such is premature and counsel below believes that most of the victims will not participate in the purported class in Quebec. Further, counsel would suggest two committees should be formed, one for wrongful death and personal injury claimants, and a second for business, property and environmental claims. In addition, counsel would inform the

Court that he has participated in other tort claimant committees in other bankruptcies over the years and would request that he be appointed to these Committees.

Dated: September 10, 2013

Respectfully submitted,

EATON PEABODY

P.O. Box 1210

Bangor, ME 04402-1210

Telephone: (207)947-0111

Facsimile: (207)942-3040

By: /s/Thomas M. Brown
Thomas M. Brown

WELLER, GREEN, TOUPS & TERRELL, L.L.P.

Post Office Box 350

Beaumont, Texas 77704-0350

Telephone: (409) 838-0101

Facsimile: (409) 832-8577

By: /s/Mitchell A. Toups
Mitchell A. Toups
TEXAS BAR NO. 20151600

**ATTORNEYS FOR CLAIMANTS, SIMON
CUSTEAU, ET AL**

EXHIBIT "A"

BUSINESS AND PROPERTY CLIENTS AS OF SEPTEMBER 1, 2013

1. Passion Chocolate s.e.n.c. – Business Owner – Loss of Business
2. Clinique Marie-Pier Dube, Inc. – Business Owner – Loss of Business
3. Bianka Tardif – Business Owner – Loss of Business
4. Gerald Rodrigue and wife, Claudette Rodrigue – Property Owner – Loss of Use
5. Jacques Dube' – Property Owner – Loss of Use
6. Lorraine Beaudoin-Langlois – Property Owner/Business Owner – Loss of Business and Loss of Use
7. Marie Pierre' Dube – Property Owner – Loss of Use