

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC  
RAILWAY, LTD.

Debtor.

Bk. No. 13-10670  
Chapter 11

**NOTICE OF FILING REVISED FORM OF ORDER AND  
REVISED SCHEDULE A TO TRUSTEE'S THIRD OMNIBUS OBJECTION**

**PLEASE TAKE NOTICE** that Robert J. Keach, the estate representative (the "Estate Representative") of the post-effective date estate of Montreal Maine & Atlantic Railway, Ltd. ("MMA" or the "Debtor"),<sup>1</sup> hereby files this revised form of order (the "Revised Proposed Order") to his *Third Omnibus Objection to Proofs of Claim That Will be Satisfied Under the CCAA Plan and That Were Released Under the Plan, Certain of Which Additionally (A) Contain Insufficient Documentation and/or (B) Were Late Filed [D.E. 1980]* (the "Third Omnibus Objection").

**PLEASE TAKE NOTICE** that the Revised Proposed Order attaches the schedules of affected claims (including a revised Schedule A), instead of referring to the Schedules attached to the Third Omnibus Objection (as did the form of order included with the Third Omnibus Objection). In particular:

- (a) Revised Schedule A (i) removes the TELUS Communications Company ("Telus")<sup>2</sup> claim and (ii) revises the grounds for objection to the GNP

<sup>1</sup> In accordance with the *Trustee's Chapter 11 Plan of Liquidation, dated July 15, 2015 (As Amended on October 8, 2015)* [D.E. 1822] (the "Plan"), upon the Effective Date of the Plan (which occurred on December 22, 2015, *see* D.E. 1927), Robert J. Keach is no longer the chapter 11 trustee of the Debtor's estate, but is the Estate Representative of the Post-Effective Date Estate (as defined in the Plan). *See* Plan § 6.1(a).

<sup>2</sup> As per the *Amended Notice of Hearing on Trustee's Third Omnibus Objection Only as to Telus Communications Company* [D.E. 2054], the response deadline of Telus to the Third Omnibus Objection was adjourned to April 5, 2016 (the "Extended Telus Deadline"). After expiry of the Extended Telus Deadline, to the extent the Estate Representative and Telus have not reached some alternative resolution, the Estate Representative will submit a Second Order Sustaining Trustee's Third Omnibus Objection to Proofs of Claim That Will be Satisfied Under the

Maine Holdings, LLC, d/b/a Great Northern Paper, LLC (“GNP”) claim<sup>3</sup>, but otherwise remains unchanged.

(b) Schedules B and C remain unchanged.

This notice will be served on the creditors listed on Schedule A (the only creditors affected by the changes referenced above).

Dated: March 24, 2016

**ROBERT J. KEACH,  
ESTATE REPRESENTATIVE OF THE POST-  
EFFECTIVE DATE ESTATE OF MONTREAL  
MAINE & ATLANTIC RAILWAY, LTD.**

By his attorneys:

/s/ Sam Anderson  
D. Sam Anderson, Esq.  
Lindsay K. Zahradka, Esq. (admitted *pro hac vice*)  
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*CCAA Plan and That Were Released Under the Plan, Certain of Which Additionally (A) Contain Insufficient Documentation and/or (B) Were Late Filed to address Telus’s claim.*

<sup>3</sup> The Estate Representative has revised the grounds for objection for the sake of accuracy, but submits that the revision has no effect on the claimant. As the deadline for GNP to respond to the Third Omnibus Objection has come to pass without response (and the effect of such nonresponse will likely be for an order to enter disallowing GNP’s claim), the Estate Representative submits that GNP will suffer no prejudice by his revision to the grounds for objection.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC  
RAILWAY, LTD.

Debtor.

Bk. No. 13-10670

Chapter 11

**ORDER SUSTAINING TRUSTEE'S THIRD OMNIBUS OBJECTION TO PROOFS OF CLAIM THAT WILL BE SATISFIED UNDER THE CCAA PLAN AND THAT WERE RELEASED UNDER THE PLAN, CERTAIN OF WHICH ADDITIONALLY (A) CONTAIN INSUFFICIENT DOCUMENTATION AND /OR (B) WERE LATE FILED**

This matter having come before the Court on the *Third Omnibus Objection to Proofs of Claim That Will Be Satisfied Under the CCAA Plan and That Were Released under the Plan, Certain of Which Additionally (A) Contain Insufficient Documentation and /or (B) Were Late Filed* (the "Third Omnibus Claims Objection")<sup>1</sup> filed by Robert J. Keach, the chapter 11 trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), and after proper notice to all creditors and other parties-in-interest, the Court having independently reviewed the Third Omnibus Claims Objection, it is hereby **ORDERED**, **ADJUDGED**, and **DECREED** as follows:

1. The Third Omnibus Claims Objection is sustained.
2. The Disputed Claims reflected on Schedules A through C hereto are disallowed in their entireties and shall be expunged from the Debtor's claims register.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon entry of the Order.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Third Omnibus Claims Objection.

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2016

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**The Honorable Peter G. Cary**  
**Chief Judge, United States Bankruptcy Court**

Claim #	Creditor name	Claim Amount
237	GNP Maine Holdings, LLC d/b/a Great Northern Paper, LLC	Unliquidated

Claim #	Creditor name	Claim Amount	Relevant Pages of Objection
303	Guay, Nancy	\$ 500,000.00	5-8
302	Lacroix, Pascale	\$ 500,000.00	5-8
436	Poirier, Melanie	\$ 500,000.00	5-8
437	Roy, Doris	\$ 500,000.00	5-8

Claim #	Creditor name	Claim Amount	Relevant Pages of Objection
524	Audet, Beland	\$ 500,000.00	5-9
526	Beaudoin, Gabriel	\$ 500,000.00	5-9
547	Beland Audet on behalf of Logi-Bel	\$ 500,000.00	5-9
575	Bizier, Jocelyne	\$ 500,000.00	5-9
529	Bouchard, Michel	\$ 500,000.00	5-9
530	Boulet, Louise	\$ 500,000.00	5-9
531	Bourgeois, Helene	\$ 500,000.00	5-9
532	Champagne, Line	\$ 500,000.00	5-9
533	Charest, Denis	\$ 500,000.00	5-9
534	Chouinard, Sonia	\$ 500,000.00	5-9
539	Daniel Gendron on behalf of Gravure Megantic	\$ 500,000.00	5-9
579	Dion, Francois	\$ 500,000.00	5-9
558	Doris Roy on behalf of The Heritage Building	\$ 500,000.00	5-9
582	Dubois, Denise	\$ 500,000.00	5-9
580	Duplessis, Amelie Campeau	\$ 500,000.00	5-9
536	Emanuel Baillargeon obo Force Action Nutrition	\$ 500,000.00	5-9
535	Favreau, Lea	\$ 500,000.00	5-9
537	Fortin, Jean-Yves	\$ 500,000.00	5-9
574	Gagne, Lisandra Arencibia Tamayo	\$ 500,000.00	5-9
512	Gesner Blenkhorn	\$ 2,000,000.00	5-9
564	Guillette, Sylvain	\$ 500,000.00	5-9
513	Isabelle Beaudry	\$ 2,000,000.00	5-9
515	Jacques Laprise	\$ 2,000,000.00	5-9
565	Josee Morin on behalf of A.L., a minor	\$ 500,000.00	5-9
566	Josee Morin on behalf of F.L., a minor	\$ 500,000.00	5-9
527	Lacroix, Roxanne Bizier	\$ 500,000.00	5-9
542	Lafontaine, Christian	\$ 500,000.00	5-9
544	Lapierre, Guillaume	\$ 500,000.00	5-9
545	Lapierre, Manon	\$ 500,000.00	5-9
546	Lavoie, Joyce	\$ 500,000.00	5-9
572	Lisandra Arencibia Tamayo Gagne obo E.G., minor	\$ 500,000.00	5-9
573	Lisandra Arencibia Tamayo Gagne obo J.B.G., minor	\$ 500,000.00	5-9
548	Martin, Andre	\$ 500,000.00	5-9
567	Melissa Robert on behalf of E.R., a minor	\$ 500,000.00	5-9
568	Melissa Robert on behalf of M.R., a minor	\$ 500,000.00	5-9
576	Michel Boulanger on behalf of J.B., a minor	\$ 500,000.00	5-9
577	Michel Boulanger on behalf of M.B., a minor	\$ 500,000.00	5-9
563	Morin, Carolyne	\$ 500,000.00	5-9
549	Nadeau, Sabrina	\$ 500,000.00	5-9
570	Pascale Lacroix on behalf of G.G., a minor	\$ 500,000.00	5-9
569	Pascale Lacroix on behalf of R.G., a minor	\$ 500,000.00	5-9
525	Pierre Boulet on behalf of Bar Laitier	\$ 500,000.00	5-9
550	Pierre Boulet on behalf of Poulet Frit Ideal	\$ 500,000.00	5-9
571	Rodrigue, Renald	\$ 500,000.00	5-9

Claim #	Creditor name	Claim Amount	Relevant Pages of Objection
551	Roy, Gabryel	\$ 500,000.00	5-9
552	Roy, Ginette	\$ 500,000.00	5-9
578	Roy, Jacques	\$ 500,000.00	5-9
553	Roy, Julie	\$ 500,000.00	5-9
554	Roy, Rejean	\$ 500,000.00	5-9
555	Roy, Sandra	\$ 500,000.00	5-9
556	St.-Hilaire, Bernard	\$ 500,000.00	5-9
581	Steve Roy on behalf of Y.R., a minor	\$ 500,000.00	5-9
514	Steven Halle	\$ 2,000,000.00	5-9
510	Tafisa Canada Inc.	\$ 3,500,000.00	5-9
557	Tanguay, Jean	\$ 500,000.00	5-9
559	Turcotte, Celine	\$ 500,000.00	5-9
560	Valiquette, Andre	\$ 500,000.00	5-9
561	Valiquette, Louise	\$ 500,000.00	5-9
562	Valiquette, Philippe	\$ 500,000.00	5-9