

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MAINE**

In re:

**MONTREAL MAINE & ATLANTIC
RAILWAY, LTD.,**

Debtor.

Chapter 11

Case No. 13-10670 (LHK)

**NOTICE OF AMENDED PROPOSED AGENDA FOR IN-PERSON JOINT STATUS
CONFERENCE BEFORE U.S. AND CANADIAN COURT PURSUANT TO
CROSS-BORDER INSOLVENCY PROTOCOL**

Time and Date of In-Person Status Conference: February 26, 2014 at 10:00 a.m. (ET)
Location: U.S. Bankruptcy Court, District of Maine, 202 Harlow Street in Bangor, Maine.

PLEASE TAKE NOTICE that on February 12, 2014, the United States Bankruptcy Court for the District of Maine (the “Bankruptcy Court”) entered an order (the “Order”) [Docket No. 651] granting the *Motion Of Official Committee Of Victims Pursuant To Cross-Border Insolvency Protocol Requesting Joint Status Conference Before U.S. And Canadian Court* [Docket No. 620] (the “Motion for Joint Status Conference”) requesting that an in-person joint procedural/scheduling conference (the “Status Conference”) be held before the Bankruptcy Court and the Canadian Court to address certain critical cross-border issues that will affect the chapter 11 case and the CCAA Proceeding.¹

PLEASE TAKE FURTHER NOTICE that the Official Committee of Victims (the “Committee”) hereby proposes the amended agenda (the “Amended Proposed Agenda”) attached hereto as Exhibit A for the Status Conference. Responses or objections to the Amended Proposed Agenda must be filed on or before February 21, 2014 and served on: (i) the United States Bankruptcy Court for the District of Maine, 202 Harlow Street, Bangor, ME 04401, Attn: Alec Leddy, Clerk; (ii) Counsel for the Committee, (a) Perkins Olson, PA, 32 Pleasant Street, PO Box 449, Portland, Maine 04112, Attn: Richard P. Olson, Esq., and (b) Paul Hastings LLP, Park Avenue Tower, 75 East 55th Street, First Floor, New York, New York 10022, Attn: Luc A. Despina, Esq.; (iii) Counsel for the Trustee, Bernstein, Shur, Sawyer & Nelson, P.A., 100 Middle Street, West Tower, Portland, ME 04101, Attn: Robert J. Keach, Esq. and Michael A. Fagone, Esq.; and (iv) the Office of the United States Trustee, 537 Congress Street, Portland, ME 04101, Attn: Jennifer H. Pincus, Esq.

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion for Joint Status Conference.

Dated: February 14, 2014

Respectfully submitted,

OFFICIAL COMMITTEE OF VICTIMS

/s/Richard P. Olson

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-and-

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EXHIBIT A

AMENDED PROPOSED AGENDA

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A. Overview of Parties In Interest

1. Monitor in CCAA Proceeding (Richter Advisory Group Inc.)
2. Chapter 11 Trustee (Robert J. Keach, Esq.)
3. Official Committee of Victims
4. The Province of Québec
5. Unofficial Committee of Wrongful Death Claimants
6. Canadian Class Action Plaintiffs
7. World Fuel Services Corporation and its affiliates
8. CIT Group Inc.
9. Rail World, Inc. and its affiliates
10. Certain Directors and Officers of the Debtor (Edward A. Burkhardt, Robert Grindrod, Gaynor Ryan, Joseph McGonigle, M. Donald Gardner, Jr. and Cathy Aldana)

¹ The Proposed Agenda has been amended solely to add the Province of Québec as a party in interest under item A.4.

11. Federal Railroad Administration
12. XL Insurance Company Limited and Indian Harbor Insurance Company
13. Wheeling & Lake Erie Railway Company
14. Office of the United States Trustee
15. Irving Paper Limited, Irving Pulp & Paper, Limited and J.D. Irving, Limited
16. Canadian Pacific Railway Company
17. Maine Department of Transportation
18. Travelers Property Casualty Company of America
19. Camden National Bank

B. Overview, Description and Status of Various Pending Cases/Proceedings

1. CCAA Proceeding
 - i. Stay With Respect to Insurance Policy
 - ii. Priorities and Canada /U.S. Sale Proceeds Allocation Issues
2. Chapter 11 Case
 - i. Priorities
 - ii. Consequences in Chapter 11 Case of MMA Canada's Status as an Unlimited Liability Company
 - iii. Adversary Proceeding Against World Fuel Services
3. Class Action Proceedings
4. State Court/Illinois Actions

C. Discussions Regarding \$25 Million Proceeds of Debtor's Insurance Policy with XL Insurance Company Limited (the "XL Policy")

1. Overview of Terms and Conditions of the XL Policy
2. Impediments to Obtaining Immediate Turnover of Proceeds of XL Policy

3. Issues Regarding Obligations of Insurer to Defend Co-Insured; Defense Costs as Independent Obligation Under Québec Law
4. Potential Frameworks for Resolution of Distribution of \$25 Million Insurance Proceeds

D. Potential Frameworks for Longer-Term Settlement

1. Competing Plans in Chapter 11 Case and CCAA Proceeding; Potential Moratorium and Mandatory Settlement Process

E. Case Administration Issues

1. Claims Bar Date Issues in Chapter 11 Case and CCAA Proceeding
2. Plan Coordination Process (Within Each Case; Cross-Border)

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CERTIFICATE OF SERVICE

I, Richard P. Olson, hereby certify that I am over eighteen years old and caused true and correct copies of the following notice to be served electronically upon all interested parties as set forth in the ECF list on February 14, 2014:

- Notice of Amended Proposed Agenda for In-Person Joint Status Conference Before U.S. and Canadian Court Pursuant to Cross-Border Insolvency Protocol [Docket No. 662]

Dated: February 14, 2014

s/ Richard P. Olson

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