UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MAINE

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)	CHAPTER 11
)	CASE NO. 13-10670-LHK
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SUPPLEMENT TO AMENDED VERIFIED STATEMENT CONCERNING REPRESENTATION OF UNOFFICIAL COMMITTEE OF WRONGFUL DEATH CLAIMANTS AS REQUIRED BY FED. R. BANKR. P. 2019

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Daniel C. Cohn, on behalf of Murtha Cullina LLP ("Murtha"), and George W. Kurr, Jr., on behalf of Gross, Minsky & Mogul, P.A. ("GMM"), hereby submit this supplement to the Amended Verified Statement Concerning Representation of Unofficial Committee of Wrongful Death Claimants as Required by Fed. R. Bankr. 2019 filed on January 28, 2014 [Docket No. 599] (the "2019 Statement") as follows:

1. On or about February 25, 2014, the instrument attached hereto as Exhibit A was executed confirming Murtha's authorization to act on behalf of the representatives the estates of the 47 victims of the massive explosion in Lac-Mégantic, Quebec, on July 6, 2013, resulting from derailment of the Debtor's train, including in their capacity as the Unofficial Committee of Wrongful Death Claimants.

[REMAINDER OF THE PAGE LEFT INTENTIONALLY BLANK]

2. Murtha and GMM will further amend the 2019 Statement to the extent necessary in accordance with Fed. R. Bankr. P. 2019.

Dated: March 5, 2014

By: /s/ George W. Kurr, Jr.
George W. Kurr, Jr.
GROSS, MINSKY & MOGUL, P.A.
23 Water Street, Suite 400
P. O. Box 917
Bangor, ME 04402-0917
Phone: (207) 942-4644 ext. 206
Fax: (207) 942-3699
gwkurr@grossminsky.com

and

Daniel C. Cohn, *pro hac vice*Taruna Garg, *pro hac vice*MURTHA CULLINA LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110
Phone: (617) 457-4000
Fax: (617) 482-3868

Counsel for the Unofficial Committee of Wrongful Death Claimants

VERIFICATION

Daniel C. Cohn, a partner of Murtha, and George W. Kurr, Jr., a partner of GMM, each hereby verifies that he has read the foregoing Verified Statement Concerning Representation of Unofficial Committee of Wrongful Death Claimants as Required by Fed. R. Bankr. P. 2019 and that the statements contained therein are true and accurate based on his own personal knowledge, including information learned from Personal Injury Counsel.

Signed under the penalties of perjury.

Daniel C. Cohn

Dated: March 5, 2014

George W. Kurr, Jr.

Dated: March 5, 2014

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SUPPLEMENT TO AMENDED VERIFIED STATEMENT CONCERNING REPRESENTATION OF UNOFFICIAL COMMITTEE OF WRONGFUL DEATH CLAIMANTS AS REQUIRED BY FED. R. BANKR. P. 2019

Exhibit A

99 HIGH STREET BOSTON, MA 02110 TELEPHONE 617.457.4000 www.murthalaw.com

DANIEL C. COHN 617.457.4155 DIRECT TELEPHONE 617.210.7058 DIRECT FAX DCOHN@MURTHALAW.COM



February 25, 2014

Peter J. Flowers, Esq. Ted A. Meyers, Esq. Meyers & Flowers 225 West Wacker Drive, Suite1515 Chicago, IL 60606

Jason C. Webster, Esq. The Webster Law Firm 6200 Savoy Drive, Suite 515 Houston, TX 77036

Mitchell A. Toups, Esq. 2615 Calder Avenue, Suite 400 Beaumont, TX 77702

Re:

Montreal Maine & Atlantic RR ("MMA") –

Authorization to Act for Wrongful Death Claimants

Dear Pete, Ted, Mitch and Jason:

We have entered into a letter agreement of even date herewith concerning the financial terms of this firm's engagement to serve as your co-counsel in representing the 47 estate representatives that assert wrongful death claims against (among others) MMA (the "Clients"). This letter will address communications with and this firm's authorization to act on behalf of the Clients, including the Clients constituted as the Unofficial Committee of Wrongful Death Claimants in MMA's chapter 11 case (the "Committee"). This letter is the sole document governing such matters.

Please confirm, by signing in the space below, that:

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Peter Flowers *et al.* February 25, 2014 Page 2

- (1) Although the wrongful death claimants themselves are this firm's Clients, you will have sole responsibility for communications with the Clients, and for directing the legal effort on behalf of the Clients regarding their wrongful death claims, including (subject to our independent professional judgment) the activities of this firm. We will rely on you, and it will be your exclusive responsibility, to have such communications with and authorizations from the Clients as may be appropriate or required under applicable law and professional rules.
- (2) Although individual Clients may have their own interests as to certain matters, in most instances their collective interests will be identical. To the extent that this firm is acting to advance the Clients' collective interests in or in connection with MMA's chapter 11 case, we are authorized to do so in the name of the Clients acting as the Committee. Paragraph (1) shall apply to such matters.

Very truly yours

Daniel C. Cohn

AGREED TO AND ACCEPTED:

MEYERS & FLOWERS

By:
Ted A. Meyers

By:
Peter J. Flowers

Peter Flowers *et al.* February 25, 2014 Page 2

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- (2) Although individual Clients may have their own interests as to certain matters, in most instances their collective interests will be identical. To the extent that this firm is acting to advance the Clients' collective interests in or in connection with MMA's chapter 11 case, we are authorized to do so in the name of the Clients acting as the Committee. Paragraph (1) shall apply to such matters.

tituly vours

Daniel C. Cohn

AGREED TO AND ACCEPTED:

	MEYERS & FLOWERS
	Ву:
Jason C. Webster	Ted A. Meyers
	By:
Mitchell A. Toups 377	Peter J. Flowers