

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

In re:

MONTREAL, MAINE & ATLANTIC
RAILWAY, LTD.,

Debtor.

Bk. No. 13-10670

Chapter 11

ROBERT J. KEACH, solely in his capacity as
the chapter 11 trustee for MONTREAL,
MAINE & ATLANTIC RAILWAY, LTD.,

Plaintiff,

v.

RED SHIELD ACQUISITION, LLC
d/b/a OLD TOWN FUEL & FIBER,

Defendant.

Adv. Pro. No. 14-01006

SUGGESTION OF BANKRUPTCY

On October 10, 2014, an involuntary petition for relief under chapter 7 of title 11 of the United States Code was filed against Defendant Red Shield Acquisition, LLC d/b/a Old Town Fuel & Fiber (the “Defendant”) pursuant to 11 U.S.C. § 303. A true and correct copy of the involuntary chapter 7 petition is attached hereto as **Exhibit A**. Thereafter, on November 10, 2014, with the consent of the Defendant, the Court entered the *Order for Relief in an Involuntary Case* (the “Order for Relief”) (Case No. 14-10812) [D.E. 34]. A true and correct copy of the Order for Relief is attached hereto as **Exhibit B**. The automatic stay imposed by 11 U.S.C. § 362 remains in effect.

Dated: May 6, 2015

ROBERT J. KEACH
CHAPTER 11 TRUSTEE OF MONTREAL
MAINE & ATLANTIC RAILWAY, LTD.

By his attorneys:

/s/ Timothy J. McKeon

Timothy J. McKeon
BERNSTEIN, SHUR, SAWYER & NELSON, P.A.
100 Middle Street
P.O. Box 9729
Portland, ME 04104-5029
Tel: (207) 774-1200
Fax: (207) 774-1127

CERTIFICATE OF SERVICE

I, Timothy McKeon, do hereby certify that on May 6, 2015, I served a true copy of the foregoing by and through the Court's ECF system on those parties receiving notification via ECF.

Dated: May 6, 2015

ROBERT J. KEACH
CHAPTER 11 TRUSTEE OF MONTREAL
MAINE & ATLANTIC RAILWAY, LTD.

By his attorneys:

/s/ Timothy J. McKeon

Timothy J. McKeon
BERNSTEIN, SHUR, SAWYER & NELSON, P.A.
100 Middle Street
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Portland, ME 04104-5029
Tel: (207) 774-1200
Fax: (207) 774-1127

Name of Debtor RED SHIELD ACQUISITION LLC

Case No. _____

TRANSFER OF CLAIM

Check this box if there has been a transfer of any claim against the debtor by or to any petitioner. Attach all documents that evidence the transfer and any statements that are required under Bankruptcy Rule 1003(a).

REQUEST FOR RELIEF

Petitioner(s) request that an order for relief be entered against the debtor under the chapter of title 11, United States Code, specified in this petition. If any petitioner is a foreign representative appointed in a foreign proceeding, a certified copy of the order of the court granting recognition is attached.

Petitioner(s) declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information, and belief.

See Annex A
 Signature of Petitioner or Representative (State title)
 TRICO MECHANICAL CONTRACTORS, INC.

Name of Petitioner _____ Date Signed _____

Name & Mailing
 Address of Individual _____
 Signing in Representative Capacity _____

/s/ Michael A. Fagone _____ 10/10/2014
 Signature of Attorney _____ Date
 Michael A. Fagone, Esq. Bernstein, Shur, Sawyer & Nelson, P.A.

Name of Attorney Firm (If any)
 100 Middle Street, P.O. Box 9729, Portland, Maine 04104

Address
 (207) 774-1200
 Telephone No. _____

See Annex A
 Signature of Petitioner or Representative (State title)
 PORTAGE WOOD PRODUCTS, LLC

Name of Petitioner _____ Date Signed _____

Name & Mailing
 Address of Individual _____
 Signing in Representative Capacity _____

/s/ Michael F. Hahn _____ 10/10/2014
 Signature of Attorney _____ Date
 Michael F. Hahn, Esq. Eaton Peabody, P.A.

Name of Attorney Firm (If any)
 One Portland Square, P.O. Box 15235, Portland, Maine 04112

Address
 (207) 430-8895
 Telephone No. _____

See Annex A
 Signature of Petitioner or Representative (State title)
 MAINE WOODS COMPANY LLC

Name of Petitioner _____ Date Signed _____

Name & Mailing
 Address of Individual _____
 Signing in Representative Capacity _____

/s/ Michael F. Hahn _____ 10/10/2014
 Signature of Attorney _____ Date
 Michael F. Hahn, Esq. Eaton Peabody, P.A.

Name of Attorney Firm (If any)
 One Portland Square, P.O. Box 15235, Portland, Maine 04112

Address
 (207) 430-8895
 Telephone No. _____

PETITIONING CREDITORS

Name and Address of Petitioner	Nature of Claim	Amount of Claim
TRICO MECHANICAL CONTRACTORS, INC. (See Annex A)	See Annex A	See Annex A
PORTAGE WOOD PRODUCTS, LLC (See Annex A)	See Annex A	See Annex A
MAINE WOODS COMPANY LLC (See Annex A)	See Annex A	See Annex A

Note: If there are more than three petitioners, attach additional sheets with the statement under penalty of perjury, each petitioner's signature under the statement and the name of attorney and petitioning creditor information in the format above. Total Amount of Petitioners' Claims See Annex A

Name of Debtor Red Shield Acquisition LLC
 Case No. _____

Additional Petitioning Creditors

REQUEST FOR RELIEF

Petitioner(s) request that an order for relief be entered against the debtor under the chapter of title 11, United States Code, specified in this petition. If any petitioner is a foreign representative appointed in a foreign proceeding, a certified copy of the order of the court granting recognition is attached.

Petitioner(s) declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information, and belief.

See Annex A
 Signature of Petitioner or Representative (State title)
CCB, INC.
 Name of Petitioner _____ Date Signed _____
 Name & Mailing
 Address of Individual _____
 Signing in Representative
 Capacity _____

/s/ Michael A. Fagone _____ 10/10/2014
 Signature of Attorney _____ Date
Michael A. Fagone, Esq. Bernstein, Shur, Sawyer & Nelson, P.A.
 Name of Attorney Firm (If Any)
100 Middle Street, P.O. Box 9729, Portland, Maine 04101
 Address
(207) 774-1200
 Telephone No. _____

PETITIONING CREDITORS

Name and Address of Petitioner	Nature of Claim	Amount of Claim
CCB, INC. (See Annex A)	See Annex A	See Annex A

Annex A to Involuntary Chapter 7 Petition

Name of Debtor:

Red Shield Acquisition LLC

Name of Petitioner:

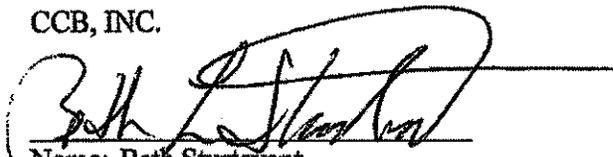
CCB, Inc.
65 Bradley Drive
Westbrook, Maine 04092

Petitioner declares under penalty of perjury that the information set forth in the involuntary petition is true and correct according to the best of its knowledge, information, and belief.

As of October 10, 2014, Petitioner holds claims against the Debtor in excess of \$73,580.24 in principal amount and accrued interest on account of the Debtor's breach of contract for failure to pay amounts due and owing under a certain contract for materials and labor provided to it by the Petitioner.

Dated: October 10, 2014

CCB, INC.



Name: Beth Sturtevant

Title: President

Annex A to Involuntary Chapter 7 Petition

Name of Debtor:

Red Shield Acquisition LLC

Name of Petitioner:

Maine Woods Company LLC
92 Fish Lake Road
P.O. Box 111
Portage, Maine 04768

Petitioner declares under penalty of perjury that the information set forth in the involuntary petition is true and correct according to the best of its knowledge, information, and belief.

As of October 10, 2014, Petitioner holds claims against the Debtor in excess of \$24,426.90 in principal amount and accrued interest on account of the Debtor's breach of contract for failure to pay amounts due and owing under a certain contract for chips delivered to it by the Petitioner between February 20, 2014 and March 21, 2014.

MAINE WOODS COMPANY LLC

Dated: October 10, 2014


Name: John McNulty
Title: Manager and Chairman of the
Management Committee

Annex A to Involuntary Chapter 7 Petition

Name of Debtor:

Red Shield Acquisition LLC

Name of Petitioner:

Portage Wood Products, LLC
112 Broadway
P.O. Box 1168
Bangor, Maine 04401

Petitioner declares under penalty of perjury that the information set forth in the involuntary petition is true and correct according to the best of its knowledge, information, and belief.

As of October 10, 2014, Petitioner holds claims against the Debtor in excess of \$634,344.71 in principal amount and accrued interest on account of the Debtor's breach of contract for failure to pay amounts due and owing under a certain contract for chips delivered to it by the Petitioner between February 10, 2014 and March 11, 2014.

PORTAGE WOOD PRODUCTS, LLC

Dated: October 10, 2014


Name: John McNulty
Title: Manager

Annex A to Involuntary Chapter 7 Petition

Name of Debtor:

Red Shield Acquisition LLC

Name of Petitioner:

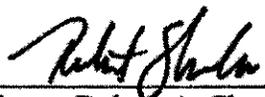
Trico Mechanical Contractors, Inc.
2800 West Navy Boulevard
Pensacola, Florida 32505

Petitioner declares under penalty of perjury that the information set forth in the involuntary petition is true and correct according to the best of its knowledge, information, and belief.

As of October 10, 2014, Petitioner holds claims against the Debtor in excess of \$293,050.00 in principal amount and accrued interest on account of the Debtor's breach of contract for failure to pay amounts due and owing under a certain contract for maintenance and repair services provided to it by the Petitioner.

TRICO MECHANICAL CONTRACTORS,
INC.

Dated: October 10, 2014



Name: Robert A. Skoczenski
Title: Treasurer and Secretary

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:

RED SHIELD ACQUISITION LLC,

Alleged Debtor.

Bk. No. 14-_____

Chapter 7

**CORPORATE OWNERSHIP STATEMENT OF CCB, INC. PURSUANT TO RULE
7007.1 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, CCB, Inc.

respectfully represents as follows:

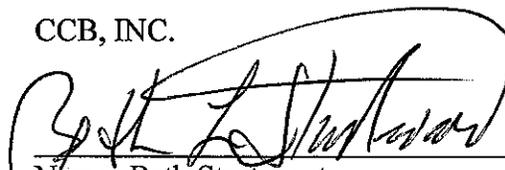
CCB, Inc. is privately owned by three individuals, with no corporate ownership of this petitioning creditor.

The undersigned is the representative of the petitioning creditor, CCB, Inc.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated: October 10, 2014
Westbrook, Maine

CCB, INC.



Name: Beth Sturtevant

Title: President

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:

RED SHIELD ACQUISITION LLC,

Alleged Debtor.

Bk. No. 14-_____

Chapter 7

**CORPORATE OWNERSHIP STATEMENT OF MAINE WOODS COMPANY LLC
PURSUANT TO RULE 7007.1 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, Maine Woods Company LLC respectfully represents as follows:

The following entities directly or indirectly own 10% or more of any class of any of Maine Woods Company LLC's equity interests: Maine Woods Holding LLC.

The undersigned is the representative of the petitioning creditor, Maine Woods Company LLC.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated: October 10, 2014
Portage, Maine

MAINE WOODS COMPANY LLC


Name: John McNulty
Title: Manager and Chairman of the Management Committee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

In re:

RED SHIELD ACQUISITION LLC,

Alleged Debtor.

Bk. No. 14-_____

Chapter 7

**CORPORATE OWNERSHIP STATEMENT OF PORTAGE WOOD PRODUCTS, LLC
PURSUANT TO RULE 7007.1 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, Portage Wood Products, LLC respectfully represents as follows:

The following entities directly or indirectly own 10% or more of any class of any of Portage Wood Products, LLC's equity interests: Seven Islands Land Company.

The undersigned is the representative of the petitioning creditor, Portage Wood Products, LLC.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated: October 10, 2014
Bangor, Maine

PORTAGE WOOD PRODUCTS, LLC


Name: John McNulty
Title: Manager

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:

RED SHIELD ACQUISITION LLC,

Alleged Debtor.

Bk. No. 14-_____

Chapter 7

**CORPORATE OWNERSHIP STATEMENT OF TRICO MECHANICAL
CONTRACTORS, INC. PURSUANT TO RULE 7007.1 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, Trico Mechanical Contractors, Inc. respectfully represents as follows:

Trico Mechanical Contractors, Inc. is privately owned by one individual, with no corporate ownership of this petitioning creditor.

The undersigned is the representative of the petitioning creditor, Trico Mechanical Contractors, Inc.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated: October 10, 2014
Pensacola, Florida

TRICO MECHANICAL
CONTRACTORS, INC.



By: Robert A. Skoczenski
Title: Treasurer and Secretary

Annex A to Involuntary Chapter 7 Petition

As set forth in this Annex A, the petition against the Debtor has been filed by the following creditor Petitioners: Trico Mechanical Contractors, Inc.; Portage Wood Products, LLC; Maine Woods Company LLC; and CCB, Inc. The aggregate claims of the Petitioners equal \$1,025,401.85, and such claims are not contingent as to liability or the subject of a bona fide dispute as to liability or amount.

To the extent that the Petitioners' claims are determined to be fully secured, each Petitioner waives its security interest with respect to \$3,850.00 of its claim. The aggregate amount so waived is equal to \$15,400.00. Thus, the Petitioners' noncontingent, undisputed claims aggregate at least \$15,325 more than the value of any lien on property of the Debtor securing such claims held by the Petitioners, in accordance with 11 U.S.C. § 303(b).

Annex A to Involuntary Chapter 7 Petition

Pursuant to Rule 1010-1(a) of the District of Maine Local Bankruptcy Rules, the petitioning creditors designate Richard D. Arnold, as President and Chief Executive Officer of Red Shield Acquisition LLC, as an authorized agent.



Form 253
(08/07)

United States Bankruptcy Court

_____ District Of MAINE _____

In re RED SHIELD ACQUISITION, LLC

Case No. 14-10812

Debtor*
Address: 24 Portland Street, P.O. Box 564
Old Town, ME 04468

Chapter 7

Last four digits of Social-Security or Individual Taxpayer-
Identification (ITIN) No(s), (if any): _____
Employer Tax-Identification (EIN) No(s), (if any): _____

ORDER FOR RELIEF IN AN INVOLUNTARY CASE

On consideration of the petition filed on October 10, 2014 (date) against the above-named debtor, an order for relief under chapter 7 of the Bankruptcy Code (title 11 of the United States Code) is granted.

Date: November 10, 2014

BY THE COURT

A handwritten signature in black ink that reads "Louis H. Kornreich".

United States Bankruptcy Judge

* Set forth all names, including trade names, used by the debtor(s) within the last 8 years. For joint debtors, set forth the last four digits of both social-security numbers or individual taxpayer-identification numbers.