

Timothy C. Woodcock
Direct Dial 207-992-4338
twoodcock@eatonpeabody.com

Eaton
Peabody
Attorneys at Law

80 Exchange Street, P.O. Box 1210
Bangor, Maine 04402-1210
Phone 207-947-0111 Fax 207-942-3040
www.eatonpeabody.com

May 5, 2022

Matthew Pollack, Esq.
Clerk of the Law Court
Maine Supreme Judicial Court
205 Newbury Street, Room 139
Portland, ME 04101

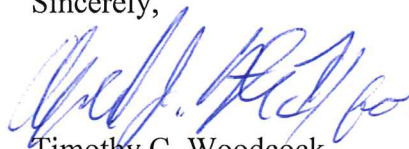
Re: *NECEC Transmission, LLC, et al. v. Bureau of Parks and Lands, et al.*
Law Court Docket No. BCD-21-416

Dear Matt:

Enclosed for filing please find Plaintiff-Intervenor/Appellant H.Q. Energy Services (U.S.) Inc.'s Request for Leave to Present Additional Rebuttal Argument.

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions.

Sincerely,



Timothy C. Woodcock

TCW/mm
Enclosure
cc: Certificate of Service

RECD ME SUPREME JUD CT
MAY 5 '22 PM3:24

STATE OF MAINE

SUPREME JUDICIAL COURT
Sitting as the Law Court
Docket No. BCD-21-416

NECEC TRANSMISSION, LLC, *et al.*)
et al.)

Plaintiff-Appellants,)

v.)

BUREAU OF PARKS AND LAND, *et al.*)

Defendant-Appellees)

**H.Q. ENERGY SERVICES
(U.S.) INC.’S REQUEST
FOR LEAVE TO PRESENT
ADDITIONAL REBUTTAL
ARGUMENT**

Plaintiff-Intervenor/Appellant H.Q. Energy Services (U.S.) Inc. (“HQUS”), pursuant to Rule 10 of the Maine Rules of Appellate Procedure, hereby respectfully requests that this Court grant HQUS leave to present an additional 1 minute of rebuttal argument in this matter. In support of this request, HQUS states as follows:

1. This Court, on its own motion, expanded the time for oral arguments to 25 minutes per side, to be allocated among the respective parties.
2. Pursuant to Rule 11(b) of the Maine Rules of Appellate Procedure, the appellants are allowed to reserve up to 3 minutes for rebuttal. This allowable amount of rebuttal has not, to HQUS’ knowledge, been expanded by the Court as of the date of this request.
3. Appellants¹ in this matter have agreed among themselves that only Plaintiff-Appellant NECEC Transmission LLC and Avangrid

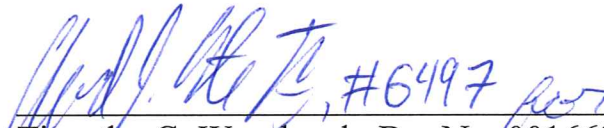
¹ In addition to HQUS, the Appellants include NECEC Transmission LLC, Avangrid Networks, Inc., Industrial Energy Consumer Group, Maine State Chamber of Commerce, Cianbro Corporation and the International Brotherhood of Electrical Works Local 104.

Networks Inc. (“NECEC/Avangrid”) and HQUS shall present oral argument.

4. In order to respond to the arguments of Appellees, HQUS seeks leave of this Court to present an additional 1 minute of rebuttal argument. For purposes of clarification, this additional rebuttal time would be included in the total 25 minutes of allocated time.
5. If granted, HQUS’ rebuttal would be presented in advance of the 3 minutes of rebuttal by NECEC/Avangrid.
6. Counsel for all Appellants have consent to this Request. HQUS has not sought the consent of Appellees because this matter relates to the internal allocation of oral argument time between Appellants.

For all of the foregoing reasons, HQUS respectfully requests that this Court grant it leave to present an additional 1 minute of rebuttal arguments during the oral arguments on this matter.

Dated: May 5, 2022.



Timothy C. Woodcock, Bar No. 001663
P. Andrew Hamilton, Bar No. 002933
Jonathan A. Pottle, Bar No. 004330
Casey M. Olesen, Bar No. 006160

EATON PEABODY
80 Exchange Street
P.O. Box 1210
Bangor, ME 04402
(207) 947-0111

*Attorneys for Intervenor-Plaintiff/Appellant
H.Q. Energy Services (U.S.) Inc.*

CERTIFICATE OF SERVICE

I, Timothy C. Woodcock, Esq., hereby certify that on May 5, 2022, pursuant to agreement of counsel for the parties, a copy of this Request for Leave to Present Additional Rebuttal Argument was served upon counsel at the addresses set forth below by electronic mail.

John A. Aromando, Esq.
Jared S. des Rosiers, Esq.
Joshua D. Dunlap, Esq.
Sara A. Murphy, Esq.
Pierce Atwood LLP
Merrill's Wharf
254 Commercial Street
Portland, ME 04101

jaromando@pierceatwood.com
jdesrosiers@pierceatwood.com
jdunlap@pierceatwood.com
smurphy@pierceatwood.com

Jonathan R. Bolton, AAG
Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006

jonathan.bolton@maine.gov

Philip M. Coffin III, Esq.
Jeffrey D. Russell, Esq.
Cyrus E. Cheslak, Esq.
Lambert Coffin
P.O. Box 15215
Portland, ME 04101

pcoffin@lambertcoffin.com

James Kilbreth, Esq.
David M. Kallin, Esq.
Jeana M. McCormick, Esq.
Oliver Mac Walton, Esq.
Drummond Woodsum
84 Marginal Way, Suite 600
Portland, ME 04101

jkilbreth@dwmlaw.com
dkallin@dwmlaw.com
jmccormick@dwmlaw.com
owalton@dwmlaw.com

Sigmund D. Schutz, Esq.
Anthony W. Buxton, Esq.
Robert B. Borowski, Esq.
Jonathan G. Mermin, Esq.
Preti Flaherty Beliveau & Pachios LLP
P.O. Box 9546
Portland, ME 04112

sschutz@preti.com
abuxton@preti.com
rborowski@preti.com
jmermin@preti.com

Benjamin K. Grant, Esq.
McTeague Higbee
P.O. Box 5000
Topsham, ME 04086

bgrant@mcteaguehigbee.com

Robert M. Cheverie, Esq.
Robert M. Cheverie & Associates, P.C.
333 East River Drive, Suite 101
East Hartford, CT 06108

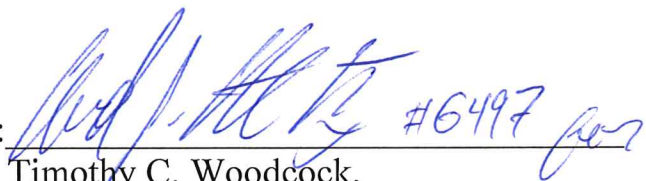
rcheverie@cheverielaw.com

Gerald F. Petruccelli, Esq.
Petruccelli Martin & Haddow, LLP
P.O. Box 17555
Portland, ME 04112

gpetruccelli@pmhlegal.com

Christopher Roach, Esq.
Roach Ruprecht Sanchez & Bischoff, P.C.
527 Ocean Avenue, Suite 1
Portland, ME 04103

croach@rrsblaw.com

By:  #6497 per
Timothy C. Woodcock,
Bar No. 001663

EATON PEABODY
80 Exchange Street
P.O. Box 1210
Bangor, ME 04402
(207) 947-0111
twoodcock@eatonpeabody.com