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## UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re:	:	Chapter 11
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SEA CONTAINERS LTD., et al., Case No. 06-11156(KJC)

(Jointly Administered)

Debtors. : Docket Ref. No. 2245

## CERTIFICATION OF COUNSEL REGARDING MOTION OF HEYSHAM PORT LIMITED TO ALLOW LATE-FILED CLAIM

I, Michael J. Barrie, state as follows:

- 1. On October 7, 2008, Heysham Port Limited ("Heysham") filed a Motion to Allow Late-Filed Claim (Docket No. 2245) (the "Motion").
- 2. As of the date hereof, I have received no answer, objection, or other responsive pleading to the Motion. Further, I have reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon.
- 3. Pursuant to the Notice of the Motion, objections to the Motion were to be filed and served no later than October 31, 2008.
- 4. The Debtors, the Official Committee of Unsecured Creditors of Sea Containers Services, Ltd. ("SCS Committee"), and the Official Committee of Unsecured Creditors of Sea Containers, Ltd. ("SCSC Committee") did not file written opposition to the Motion, but contacted counsel for Heysham to negotiate a proposed form of order regarding the Motion.

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases are Sea Containers Caribbean Inc., Sea Containers Ltd. and Sea Containers Services Ltd.

- 5. Annexed hereto as **Exhibit A** is a proposed form of order resolving the Motion, agreed upon by Heysham, the Debtor, the SCS Committee and the SCSC Committee.
- 6. It is respectfully requested that the Court enter the proposed form of order annexed hereto as Exhibit A.
- 7. The undersigned is available to answer any questions or address any concerns of the Court.

Dated: November 7, 2008

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ Michael J. Barrie

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-and-

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Counsel to Heysham Port Limited