

RELIEF REQUESTED WITHOUT A HEARING

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

In re:

MONTREAL, MAINE & ATLANTIC
RAILWAY, LTD.,

Debtor.

Bk. No. 13-10670
Chapter 11

**CONSENT MOTION TO CONTINUE THE HEARING ON LEXINGTON INSURANCE
COMPANY'S APPLICATION FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE CLAIM AND TO EXTEND
RELATED DEADLINES**

Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), with the consent of Lexington Insurance Company ("Lexington Insurance"), hereby requests that this Court enter an Order extending certain deadlines and continuing the hearing with respect to Lexington Insurance's Application for Allowance and Payment of Administrative Claim [D.E. 1296] (the "Application"). In support of this consented-to motion, the Trustee states as follows:

1. On October 3, 2014, the Trustee filed the Trustee's Motion, Pursuant to 11 U.S.C. §§ 105(a) and 503, for an Order Establishing the Deadline for Filing Administrative Claims and Approving the Form and Manner of Notice Thereof [D.E. 1134] (the "Admin Bar Date Motion"). Thereafter, on October 22, 2014, the Court entered an order granting the Admin Bar Date Motion [D.E. 1164].

2. On December 1, 2014, Lexington Insurance submitted the Application. A hearing on the Application is scheduled for January 13, 2015 (the "Hearing"). The deadline to file a response or objection (the "Objection Deadline") is currently scheduled for December 22, 2014.

3. Counsel for Lexington Insurance and the Trustee have agreed to continue the Hearing from January 13, 2015 to March 10, 2015. The parties have also agreed to extend the Objection Deadline from December 22, 2014 to February 24, 2015. The parties further agree that the deadline for Lexington Insurance to file a reply to any response or objection to the Application will be March 3, 2015 (the “Reply Deadline”).

4. The Trustee and Lexington Insurance request that the Court grant this consented-to motion without a hearing pursuant to D. Me. LBR 9013-1.

WHEREFORE, the Trustee, with Lexington Insurance’s consent, respectfully requests that the Court enter an Order: (a) continuing the Hearing to March 10, 2015 at 10:00 a.m. E.S.T.; (b) extending the Objection Deadline to February 24, 2015; (c) extending the Reply Deadline to March 3, 2015; and (b) granting such other and further relief as may be granted.

Dated: December 19, 2014

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

By his attorneys:

/s/ Timothy J. McKeon

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FOR THE DISTRICT OF MAINE**

In re:

MONTREAL, MAINE & ATLANTIC
RAILWAY, LTD.,

Debtor.

Bk. No. 13-10670
Chapter 11

**ORDER GRANTING THE CONSENT MOTION TO CONTINUE THE HEARING ON
LEXINGTON INSURANCE COMPANY'S APPLICATION FOR ALLOWANCE
AND PAYMENT OF ADMINISTRATIVE CLAIM AND TO EXTEND
RELATED DEADLINES**

Upon consideration of the Consent Motion to Continue the Hearing on Lexington Insurance Company's Application for Allowance and Payment of Administrative Claim and to Extend Related Deadlines (the "Consent Motion") filed by Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd., and the Trustee and Lexington Insurance consenting to the relief sought in the Consent Motion, and without a hearing pursuant to D. Me. LBR 9013-1(d)(1) and Fed. R. Bankr. P. 9006(b)(1), it is hereby **ORDERED**, **ADJUDGED** and **DECREED** as follows:¹

1. The Consent Motion is granted.
2. The Hearing shall take place on **March 10, 2015** at **10:00 a.m. E.S.T.**
3. The Objection Deadline is extended up to and including **February 24, 2015**.
4. The Reply Deadline is extended up to and including **March 3, 2015**.

¹ Unless otherwise indicated, all capitalized terms used but not defined herein have the same meaning as ascribed to such terms in the Consent Motion.

5. This Order shall become final in fourteen (14) days unless a party in interest sooner objects, in which case the matter shall be set for hearing and considered by the court as if this Order had not been entered.

Dated:

The Honorable Louis H. Kornreich
United States Bankruptcy Judge