

***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 STAY THE HEARING ON THE TRUSTEE'S MOTIONS FOR  
RULE 2004 EXAMINATIONS OF SLAWSON EXPLORATION COMPANY, INC.  
AND DEVLAR ENERGY MARKETING, LLC**

Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), hereby requests that this Court enter an Order continuing the hearing (the "Hearing") with respect to the following motions (together, the "Rule 2004 Motions"):

- *Motion for Order Compelling Slawson Exploration Company, Inc. to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1139]; and
- *Motion for Order Compelling Devlar Energy Marketing, LLC to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1143].

In further support of this consented-to motion, the Trustee states as follows:

1. On October 7, 2014, the Trustee filed the Rule 2004 Motions and scheduled a hearing thereon for November 18, 2014 (the "Hearing"). The deadline to file a response or objection to the Rule 2004 Motions was scheduled for November 4, 2014.

2. On November 4, 2014, Slawson Exploration Company, Inc. ("Slawson") and Devlar Energy Marketing, LLC ("Devlar") jointly filed their *Response in Opposition to Trustee's Motion for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1190], as well as joined in the *Joint Response and Objection to Motions for Rule 2004 Examination* [D.E. 1196].

3. On November 17, 2014, the Trustee filed the *Consent Motion to Continue the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* [D.E. 1225] (the "Consent Motion"), which proposed to reschedule the Hearing from November 18, 2014 to December 16, 2014. On November 18, 2014, the Court entered an order granting the Consent Motion [D.E. 1228].

4. On December 12, 2014, the Trustee filed the *Second Consent Motion to Continue the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* [D.E. 1306] (the "Second Consent Motion"), which proposed to reschedule the Hearing from December 16, 2014 to January 13, 2015. On December 15, 2014, the Court entered an order granting the Second Consent Motion [D.E. 1312].

5. On January 12, 2015, the Trustee filed the *Third Consent Motion to Continue the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* [D.E. 1335] (the "Third Consent Motion"), which proposed to reschedule the Hearing from January 13, 2015 to February 10, 2015. On January 12, 2015, the Court entered an order granting the Third Consent Motion [D.E. 1338].

6. On February 2, 2015, the Trustee filed the *Fourth Consent Motion to Continue the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* [D.E. 1352] (the "Fourth Consent Motion"), which proposed to reschedule the Hearing from February 10, 2015 to March 10, 2015. On February 3, 2015, the Court entered an order granting the Fourth Consent Motion [D.E. 1355].

7. On March 9, 2015, the Trustee filed the *Fifth Consent Motion to Continue the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* [D.E. 1375] (the "Fifth Consent Motion"), which proposed to reschedule the Hearing from March 10, 2015 to April 28, 2015. On March 10, 2015, the Court entered an order granting the Fifth Consent Motion [D.E. 1377].

8. Since the Court's entry of the order granting the Fifth Consent Motion, counsel for the Trustee and counsel for Slawson and Devlar have continued to engage in settlement discussions. As a result thereof, the Trustee has entered into proposed settlement agreements with Slawson and Devlar.

9. In light of the above, the Trustee, Slawson and Devlar, through counsel, believe that staying further consideration of the Rule 2004 Motions will advance these settlement efforts as well as promote judicial economy. As such, the Trustee has agreed to seek an order from the Court that the Hearing be stayed and that such stay remain in effect until the entry of an order terminating the stay. The Trustee has also agreed to request that the Hearing, which is currently scheduled for April 28, 2015, be cancelled so that it may be rescheduled upon termination of the stay.

WHEREFORE, the Trustee respectfully requests that the Court enter an Order: (a) staying the Hearing until the entry of an order terminating the stay; (b) cancelling the Hearing on the Rule 2004 Motions scheduled for April 28, 2015; and (c) granting such other and further relief as may be granted.

Dated: April 27, 2015

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

By his attorneys:

/s/ Timothy J. McKeon

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

In re:

MONTREAL, MAINE & ATLANTIC  
RAILWAY, LTD.,

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Bk. No. 13-10670

Chapter 11

**ORDER GRANTING THE CONSENT MOTION TO STAY THE HEARING ON THE  
TRUSTEE'S MOTIONS FOR RULE 2004 EXAMINATIONS OF SLAWSON  
EXPLORATION COMPANY, INC. AND DEVLAR  
ENERGY MARKETING, LLC**

Upon consideration of the *Consent Motion to Stay the Hearing on the Trustee's Motions for Rule 2004 Examinations of Slawson Exploration Company, Inc. and Devlar Energy Marketing, LLC* (the "Consent Motion") filed by Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd., and the Trustee, Slawson and Devlar 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:<sup>1</sup>

1. The Motion is granted.
2. The Hearing on the Rule 2004 Motions scheduled for April 28, 2015 is cancelled.
3. The Hearing is stayed until the entry of an order terminating the stay.

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

4. 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:

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The Honorable Peter G. Cary  
United States Bankruptcy Judge