

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

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

Plaintiff,

v.

WORLD FUEL SERVICES CORPORATION,
WORLD FUEL SERVICES, INC.,
WESTERN PETROLEUM COMPANY,
WORLD FUEL SERVICES, CANADA, INC.,
PETROLEUM TRANSPORT SOLUTIONS,
LLC, CANADIAN PACIFIC RAILWAY
COMPANY, IRVING OIL LIMITED, and
SMBC RAIL SERVICES, LLC,

Defendants.

Adversary Proceeding No. 14-1001

**CONSENTED TO MOTION TO CONTINUE PRE-TRIAL CONFERENCE AND TO
EXTEND THE DEADLINE FOR THE TRUSTEE TO RESPOND TO CANADIAN
PACIFIC RAILWAY COMPANY'S MOTION TO DISMISS**

Defendant Canadian Pacific Railway Company ("CP") hereby files this motion, with the consent of Plaintiff Robert J. Keach (the "Trustee"), solely in his capacity as the chapter 11 trustee of Montreal, Maine & Atlantic Railway, Ltd., seeking an order from the Court continuing the currently scheduled pre-trial conference in the above-captioned adversary proceeding and

extending the deadline for the Trustee to file a response to CP's Motion to Dismiss [Adv. D.E. 140]. In support of this consented-to motion, CP states as follows:

1. By Order dated May 20, 2015 this Court scheduled a pre-trial conference in this proceeding for July 21, 2015 at 10:30 a.m. E.S.T. [Adv. D.E. 135].

2. On June 23, 2015, CP filed a Motion to Dismiss the Trustee's Second Amended Complaint. The deadline to file an objection to the Motion to Dismiss is currently July 14, 2015 (the "Objection Deadline"), while a hearing on the motion is scheduled for August 18, 2015.

3. By Order dated June 26, 2015 this Court has stayed this proceeding as to all defendants except CP [Adv. D.E. 145].

4. CP's counsel has a scheduling conflict with the July 21, 2015 pre-trial conference. Accordingly, CP, with the Trustee's consent, requests that the pre-trial conference be continued from July 21, 2015 to August 18, 2015 at 10:30 a.m. E.S.T., which is the same date and time as the hearing on the Motion to Dismiss.

5. Additionally, counsel for CP and the Trustee have agreed to extend the Objection Deadline from July 14, 2015 to July 21, 2015.

WHEREFORE, CP, with the Trustee's consent, requests that the Court enter an Order: (a) continuing the pre-trial conference to August 18, 2015 at 10:30 a.m. E.S.T.; (b) extending the Objection Deadline to July 21, 2015; and (c) granting such other and further relief as may be granted.

Dated: July 7, 2015

BRIGGS AND MORGAN, P.A.

By: /s/ Paul J. Hemming
Timothy R. Thornton
John R. McDonald
Paul J. Hemming
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And

Pearce & Dow, LLC

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**ATTORNEYS FOR CANADIAN
PACIFIC RAILWAY COMPANY**

**UNITED STATES BANKRUPTCY COURT
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the chapter 11 trustee for MONTREAL,
MAINE & ATLANTIC RAILWAY, LTD.,

Plaintiff

v.

WORLD FUEL SERVICES CORPORATION,
WORLD FUEL SERVICES, INC.,
WESTERN PETROLEUM COMPANY,
WORLD FUEL SERVICES, CANADA, INC.,
PETROLEUM TRANSPORT SOLUTIONS,
LLC, CANADIAN PACIFIC RAILWAY
COMPANY, IRVING OIL LIMITED, and
SMBC RAIL SERVICES, LLC,

Defendants.

Adversary Proceeding No. 14-1001

**ORDER GRANTING CONSENTED TO MOTION TO CONTINUE PRE-TRIAL
CONFERENCE AND TO EXTEND THE DEADLINE FOR THE TRUSTEE
TO RESPOND TO CANADIAN PACIFIC RAILWAY
COMPANY'S MOTION TO DISMISS**

Upon consideration of the Consented to Motion to Continue Pre-Trial Conference and to Extend the Deadline for the Trustee to Respond to Canadian Pacific Railway Company's Motion to Dismiss (the "Consent Motion") filed by Canadian Pacific Railway Company ("CP"), and Plaintiff Robert J. Keach (the "Trustee"), solely in his capacity as the chapter 11 trustee of Montreal, Maine & Atlantic Railway, Ltd.,

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 pre-trial conference in the above-captioned adversary proceeding shall take place on **August 18, 2015** at **10:30 a.m. E.S.T.** following the 10:30 a.m. hearing on CP's Motion to Dismiss.
3. The Objection Deadline with respect to the Motion to Dismiss is extended to **July 21, 2015**.
4. This Order will 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: July ____, 2015

Hon. Peter G. Cary
Chief United States Bankruptcy Judge

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.

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RAILWAY, LTD.,
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Bk. No. 13-10670
Chapter 11

Adversary Proceeding No. 14-1001

ROBERT J. KEACH, solely in his capacity
as the chapter 11 trustee for MONTREAL,
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Plaintiff

v.

CERTIFICATE OF SERVICE

WORLD FUEL SERVICES
CORPORATION, WORLD FUEL
SERVICES, INC., WESTERN
PETROLEUM COMPANY, WORLD
FUEL SERVICES, CANADA, INC.,
PETROLEUM TRANSPORT
SOLUTIONS, LLC, IRVING OIL
LIMITED, AND CANADIAN PACIFIC
RAILWAY COMPANY AND SMBC
RAIL SERVICES, LLC

Defendants.

I, Sandra J. Cambronne, being over the age of eighteen and an employee of Briggs
and Morgan, P.A. in Minneapolis, Minnesota, hereby certify that on July 7, 2015 I filed
the following pleadings in the above-referenced adversary proceeding:

1. Consented to Motion to Continue Pre-Trial Conference and to Extend the
Deadline for the Trustee to Respond to Canadian Pacific Railway
Company's Motion to Dismiss;

2. Order Granting Consented to Motion to Continue Pre-Trial Conference and
to Extend the Deadline for the Trustee to Respond to Canadian Pacific
Railway Company's Motion to Dismiss

via the Court's CM/ECF electronic filing system, which sent notice to all parties
receiving notification through the CM/ECF system.

Dated: July 7, 2015

/s/ Sandra J. Cambronne

Briggs and Morgan, P.A.
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(612) 977-8400