

*Relief Requested Without a Hearing*

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

**Montreal Maine & Atlantic Railway Ltd.**

Chapter 11  
Case No. 13-10670

Debtor

**CONSENTED TO MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
THE TRUSTEE'S MOTION TO AUTHORIZE ABANDONMENT OF THE HERMON  
PARCEL PURSUANT TO 11 U.S.C. § 554(a)**

NOW COMES Patricia Aho, Commissioner of the Maine Department of Environmental Protection (the "MDEP"), by and through her attorney Kevin J. Crosman, and files this *Consented to Motion for Extension of Time to File a Response to the Trustee's Motion to Authorize Abandonment of the Herman Parcel Pursuant to 11 U.S.C. § 554(a)*. In support of this Motion to Extend, counsel for MDEP states as follows:

1. On July 17, 2015, Trustee Keach filed the Motion to Authorize Abandonment of the Herman Parcel Pursuant to 11 U.S.C. § 554(a) (the "Motion to Abandon"). The Hearing Notice sets July 31, 2015 as the objection deadline.
2. The Motion to Abandon was not referred to the Office of the Maine State Attorney General until July 27, 2015. The attorneys assigned to the case need additional time to vet the issues raised by the Motion to Abandon and to prepare a responsive pleading thereto.
3. Counsel for MDEP anticipates being able to file MDEP's response by close of business on Thursday, August 13, 2015.

4. The chapter 11 trustee, Robert J. Keach, Esq., has been consulted and consents to the relief requested.
5. Counsel for the United States Trustee, Jennifer H. Pincus, Esq. has been consulted and consents to the relief requested.

WHEREFORE, the Commissioner respectfully requests that this Court extend the time for MDEP to file a response to the Motion to Abandon to August 13, 2015, and grant such other relief as is just and fair.

Dated: July 28, 2015, in Augusta, Maine.

Respectfully submitted,

/s/Kevin J. Crosman

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CERTIFICATE OF SERVICE

I, Kevin J. Crosman, Attorney for the Commissioner of the Maine Department of Environmental Protection, hereby certify that I have this day made service by electronic mail upon the indicated individuals and entities pursuant to the Bankruptcy Court's ECF system of the foregoing *CONSENTED TO MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO THE TRUSTEE'S MOTION TO AUTHORIZE ABANDONMENT OF THE HERMON PARCEL PURSUANT TO 11 U.S.C. § 554(a)*, the attached *ORDER ON MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO THE TRUSTEE'S MOTION TO AUTHORIZE ABANDONMENT OF THE HERMAN PARCEL PURSUANT TO 11 U.S.C. § 554(a)*, and of this Certificate of Service. I also hereby certify that I have served the individuals and entities indicated below pursuant to the Bankruptcy Court's ECF system.

Robert J. Keach, Esq., Chapter 11 Trustee

Office of the U.S. Trustee

Dated: July 28, 2015

/s/Kevin J. Crosman  
Kevin J. Crosman  
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Maine Department of Environmental Protection's ("MDEP") *Consented to* Motion for Extension of Time to File Response to the Trustee's Motion to Authorize Abandonment of the Herman Parcel Pursuant to 11 U.S.C. § 554 is hereby **GRANTED**. MDEP's Response is due by August 13, 2015.

*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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Chief Judge Peter G. Cary