

***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 EXTEND THE DEADLINE TO RESPOND TO THE  
TRUSTEE'S MOTION TO ENFORCE**

Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), hereby requests that this Court enter an Order extending the deadline to file an objection (the "Objection Deadline") with respect to the *Trustee's Motion for Entry of an Order (i) Enforcing the Releases and Injunctions Contained in the Confirmation Order and Confirmed Plan of Liquidation and (ii) Awarding Costs and Attorney's Fees* [D.E. 1814] (the "Enforcement Motion"). In further support of this consented-to motion, the Trustee states as follows:<sup>1</sup>

1. The Objection Deadline with respect to the Enforcement Motion is currently November 10, 2015.
2. Counsel for the Insurance Plaintiffs has requested an extension of the Objection Deadline to Friday, November 13, 2015. The Trustee consents to such request.

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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 Enforcement Motion.

WHEREFORE, the Trustee respectfully requests that the Court extend the Objection Deadline to November 13, 2015 and grant such other and further relief as may be granted.

Dated: November 11, 2015

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

By his attorneys:

*/s/ Timothy J. McKeon* \_\_\_\_\_

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**ORDER GRANTING CONSENT MOTION TO EXTEND THE DEADLINE TO  
RESPOND TO THE TRUSTEE'S MOTION TO ENFORCE**

Upon consideration of the *Consent Motion to Extend the Deadline to Respond to the Trustee's Motion to Enforce* (the "Consent Motion") filed by Robert J. Keach, as trustee (the "Trustee") of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), and the Trustee and the Insurance Plaintiffs 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. Bank. P. 9006(b)(1), it is hereby **ORDERED**, **ADJUDGED** and **DECREED** as follows:<sup>1</sup>

1. The Consent Motion is granted.
2. The Objection Deadline is extended up to and including **November 13, 2015**.
3. 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: \_\_\_\_\_, 2015

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The Honorable Peter G. Cary  
United States Bankruptcy Judge for the  
District of Maine

<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.