

*Relief Requested Without Hearing*

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC  
RAILWAY, LTD.

Debtor.

Chapter 11  
Case No. 13-10670

**CONSENT MOTION TO CONTINUE HEARING WITH RESPECT TO CLAIMANT'S [SIC] MOTION FOR RELIEF FROM JUDGMENT AND RECONSIDERATION OF TRUSTEE'S THIRD OMNIBUS OBJECTION TO PROOFS OF CLAIM THAT WILL BE SATISFIED UNDER THE CCAA PLAN AND THAT WERE RELEASED UNDER THE PLAN, CERTAIN OF WHICH ADDITIONALLY (A) CONTAIN INSUFFICIENT DOCUMENTATION AND/OR (B) [WERE] LATE FILED**

The claimants listed on Schedule A (collectively, the "Claimants") to the *Claimant's [Sic] Motion for Relief from Judgment and Reconsideration of Trustee's Third Omnibus Objection to Proofs of Claim That Will be Satisfied Under the CCAA Plan and that were Released Under the Plan, Certain of Which Additionally (A) Contain Insufficient Documentation and/or (B) [Were] Late Filed* [D.E. 2149] (the "Motion for Relief"), by and through their undersigned counsel, hereby file this motion seeking an order continuing the hearing on the Motion for Relief to August 30, 2016. Robert J. Keach, the estate representative (the "Estate Representative") for the post-effective date estate of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), consents to the relief requested herein. By way of further support the Claimants state as follows:

1. On April 19, 2016, the Claimants filed the Motion. A hearing is scheduled to take place on the Motion for Relief on July 26, 2016.
2. On May 3, 2016, the Estate Representative filed his objection to the Motion for Relief [D.E. 2164] (the "Objection").

3. The parties are discussing a possible resolution with respect to the Motion for Relief but require additional time to continue discussions regarding the contours of a resolution. Accordingly, the parties seek to continue the hearing on the Motion for Relief to August 30, 2016 to accommodate further discussions.

WHEREFORE, the Claimants respectfully requests that this Court enter an order (1) continuing the hearing on the Motion for Relief until August 30, 2016 at 9:00 a.m. and (2) granting such further relief as this Court deems necessary and appropriate.

Dated: July 25, 2016

By their attorneys:

/s/ George W. Kurr, Jr., Esq.  
George W. Kurr, Jr., Esq.  
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#### CERTIFICATE OF SERVICE

I, George W. Kurr, Jr., Esquire, of the firm Gross, Minsky & Mogul, P.A., hereby certify that on July 25, 2016, I electronically filed **CONSENT MOTION TO CONTINUE HEARING WITH RESPECT TO CLAIMANT'S MOTION FOR RELIEF FROM JUDGMENT AND RECONSIDERATION OF CLAIM TRUSTEE'S THIRD OMNIBUS OBJECTION TO PROOFS OF CLAIM THAT WILL BE SATISFIED UNDER THE CCAA PLAN AND THAT WERE RELEASED UNDER THE PLAN, CERTAIN OF WHICH ADDITIONALLY (A) CONTAIN INSUFFICIENT DOCUMENTATION AND/OR (B) LATE FILED** with the Court via the CM/ECF electronic filing system which will send notification of such filing to the attorneys/parties of record who have registered as CM/ECF participants.

/s/ George W., Kurr, Jr., Esq.  
George W. Kurr, Jr., Esq.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC  
RAILWAY, LTD.

Debtor.

Chapter 11  
Case No. 13-10670

**ORDER GRANTING CONSENT MOTION TO CONTINUE HEARING  
WITH RESPECT TO CLAIMANT'S [SIC] MOTION FOR RELIEF FROM  
JUDGMENT AND RECONSIDERATION OF TRUSTEE'S THIRD OMNIBUS  
OBJECTION TO PROOFS OF CLAIM THAT WILL BE SATISFIED UNDER  
THE CCAA PLAN AND THAT WERE RELEASED UNDER THE PLAN,  
CERTAIN OF WHICH ADDITIONALLY (A) CONTAIN INSUFFICIENT  
DOCUMENTATION AND/OR (B) [WERE] LATE FILED**

Upon the motion of those claimants listed on Schedule A (collectively, the "Claimants") to the *Claimant's [Sic] Motion for Relief from Judgment and Reconsideration of Trustee's Third Omnibus Objection to Proofs of Claim That Will be Satisfied Under the CCAA Plan and that were Released Under the Plan, Certain of Which Additionally (A) Contain Insufficient Documentation and/or (B) [Were] Late Filed* [D.E. 2149] (the "Motion for Relief") for an order continue the hearing on the Motion for Relief to August 30, 2016 (the "Motion to Continue"),<sup>1</sup> and the Estate Representative having consented to the relief sought in the Motion to Continue; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

**ORDERED, ADJUDGED and DECREED** that:

1. The Motion to Continue is granted.
2. The hearing on the Motion for Relief is continued to August 30, 2016 at 9:00 a.m.
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.

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion to Continue.

Dated: \_\_\_\_\_, 2016

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**The Honorable Peter G. Cary  
Chief Judge, United States Bankruptcy  
Court for the District of Maine**

UNITED STATE BANKRUPTCY COURT  
DISTRICT OF MAINE

In Re:

Montreal Maine & Atlantic  
Railway, LTD.,  
Debtor.

Bk. No. 13-10670  
Chapter 11

**Schedule A to Claimant's Motion for Relief from Judgment and Reconsideration of Claim Trustee's  
Third Omnibus Objection to Proofs of Claim That Will be Satisfied Under The CCAA Plan  
and That Were Released Under the Plan, Certain of Which  
Additionally (A) Contain Insufficient Documentation and/or (B) Late Filed**

**Schedule "A"**

303 Guay, Nancy  
302 Lacroix, Pascale  
436 Poirier, Melanie  
437 Roy, Doris  
524 Audet, Beland  
526 Beaudoin, Gabriel  
547 Beland Audet on behalf of Logi-Bel  
575 Bizier, Jocelyne  
529 Bouchard, Michel  
530 Boulet, Louise  
531 Bourgeois, Helene  
532 Champagne, Line  
533 Charest, Denis  
534 Chouinard, Sonia  
539 Daniel Gendron on behalf of Gravure Megantic  
579 Dion, Francois  
558 Doris Roy on behalf of The Heritage Building  
582 Dubois, Denise

580 Duplessis, Amelie Campeau  
536 Emanuel Baillargeon obo Force Action Nutrition  
535 Favreau, Lea  
537 Fortin, Jean-Yves  
574 Gagne, Lisandra Arencibia Tamayo  
565 Josee Morin on behalf of A.L, a minor  
566 Josee Morin on behalf of F.L., a minor  
527 Lacroix, Roxanne Bizier  
542 Lafontaine, Christian  
544 Lapierre, Guillaume  
545 Lapierre, Manon  
546 Lavoie, Joyce  
572 Lisandra Arencibia Tamayo Gagne obo E.G., minor  
573 Lisandra Arencibia Tamayo Gagne obo J.B.G., minor  
548 Martin, Andre  
567 Melissa Robert on behalf of E.R., a minor  
568 Melissa Robert on behalf of M.R., a minor  
576 Michel Boulanger on behalf of J.B., a minor  
577 Michel Boulanger on behalf of M.B., a minor  
563 Morin, Carolyne  
549 Nadeau, Sabrina  
570 Pascale Lacroix on behalf of G.G., a minor  
569 Pascale Lacroix on behalf of R.G., a minor  
525 Pierre Boulet on behalf of Bar Laitier  
550 Pierre Boulet on behalf of Poulet Frit Ideal  
571 Rodrigue, Renald  
551 Roy, Gabryel  
552 Roy, Ginette  
578 Roy, Jacques  
553 Roy, Julie

554 Roy, Rejean  
555 Roy, Sandra  
556 St.-Hilaire, Bernard  
581 Steve Roy on behalf of Y.R., a minor  
557 Tanguay, Jean  
559 Turcotte, Celine  
560 Valiquette, Andre  
561 Valiquette, Louise  
562 Valiquette, Philippe