

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
SUPPLEMENTAL MOTION FOR EXTENSION OF TIME TO FILE PROOF OF
CLAIM BY CREDITOR TAFISA CANADA, INC.**

Tafisa Canada, Inc., the debtor and debtor-in-possession (the “Debtor”) in the above-captioned chapter 11 case, by and through its undersigned counsel, hereby files this motion seeking an order continuing until October 18, 2016, the hearing on the Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. [D.E. 2223] (the “Motion”) filed by Tafisa Canada, Inc. (“Tafisa”). Tafisa and the Trustee consent to the relief requested herein. By way of further support, the Creditor states as follows:

1. On August 18, 2016, Tafisa filed a Supplemental Motion for Extension of Time to File Proof of Claim. A hearing was scheduled to take place on the Original Motion on August 30, 2016, at 9:00 a.m. at the Bankruptcy Court in Portland, Maine.

2. The parties are discussing a possible resolution with respect to the Claim of Creditor, Tafisa Canada, Inc., but require additional time to resolve certain issues relating to the Claim and to determine the extent of Tafisa Canada, Inc.’s claim. Accordingly, the parties seek to continue the hearing on the Motion to October 18, 2016 to accommodate further discussions.

3. The Debtor believes that the relief requested herein is in the best interest of the estate and its creditors because, if successful, negotiations between the parties would result in an amicable resolution of, at least, the claims of Tafisa Canada, Inc., eliminating the need for costly and time consuming litigation.

4. The Trustee, Robert E. Keach, consents to said continuance.

WHEREFORE, the Debtor respectfully requests that this Court enter an order (1) continuing the hearing on the Application until October 18, 2016 at 9:00 a.m. and (2) granting such further relief as this Court deems necessary and appropriate.

Dated: August 19, 2016

TAFISA CANADA, INC.

By its attorneys:

/s/ Mitchell A. Toups, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been furnished to all counsel of record listed through this Court's e-file system, e-mail; facsimile; overnight delivery; Regular Mail and/or Certified Mail, Return Receipt Requested on August 19, 2016.

/s/ Mitchell A. Toups
Mitchell A. Toups

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

In re:

**MONTREAL MAINE & ATLANTIC
RAILWAY LTD.,**

Debtor.

Chapter 11
Case No. 13-10670

**CERTIFICATE OF SERVICE ON SUPPLEMENTAL CONSENT MOTION TO
CONTINUE HEARING WITH RESPECT TO SUPPLEMENTAL MOTION FOR
EXTENSION OF TIME TO FILE PROOF OF CLAIM BY CREDITOR TAFISA
CANADA, INC.**

I hereby certify that on August 19, 2016, I filed the Motion to Continue Hearing with Respect to Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. I further certify that on August 19, 2016, I filed the Proposed Order on the Motion to Continue Hearing with Respect to Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. I further certify that I caused copies of the Motion and the proposed Order to be served via electronic mail through this Court's e-file system.

Dated: August 19, 2016

TAFISA CANADA, INC.

By its attorneys:

/s/ Mitchell A. Toups, Esq.

Mitchell A. Toups, Esq.

Weller, Green, Toups & Terrell, L.L.P.

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DISTRICT OF MAINE**

In re:

**MONTREAL MAINE & ATLANTIC
RAILWAY LTD.,**
Debtor.

Chapter 11
Case No. 13-10670

**ORDER GRANTING MOTION TO CONTINUE HEARING WITH RESPECT TO
SUPPLEMENTAL MOTION FOR EXTENSION OF TIME TO FILE PROOF OF
CLAIM BY CREDITOR TAFISA CANADA, INC.**

Upon consideration of the Motion to Continue Hearing with Respect to Supplemental Motion for Extension of Time to File Proof of Claim by Creditor Tafisa Canada, Inc., and after noting the Consent of the Trustee, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. The Motion to Continue Hearing is GRANTED.
2. The hearing on Tafisa Canada Inc.'s Motion for Extension of Time to File Proof of Claim [D.E. 1820] will be held on **Tuesday, October 18, 2016, at 9:00 a.m.** at the U.S. Bankruptcy Court, 537 Congress Street, Second Floor, Portland, Maine.
3. Any objections to the Motion must be filed by **Monday, October 17, 2016**. The debtor and debtor-in-possession (the "Debtor") in the above-captioned chapter 11 case, by and through its undersigned counsel, hereby files this motion seeking an order continuing until October 18, 2016 the hearing on the Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. [D.E. 2223]

Dated: August 19, 2016

HONORABLE U.S. BANKRUPTCY JUDGE PRESIDING