

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

**UNOPPOSED 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 B attached hereto (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 May 12, 2017. Robert J. Keach, the estate representative (the "Estate Representative") for the post-effective date estate of Montreal Maine & Atlantic Railway, Ltd. (the "Debtor"), does not oppose 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 April 4, 2017.

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. The parties believe that a settlement is likely which will avoid a hearing on these four (4) matters. Accordingly, the parties seek to continue the hearing on the Motion for Relief to May 12, 2017 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 May 12, 2017 at 9:00 a.m. and (2) granting such further relief as this Court deems necessary and appropriate.

Dated: April 3, 2017

By their attorneys:

/s/ 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 April 3, 2017, I electronically filed **UNOPPOSED 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 UNOPPOSED 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 B attached to said Motion (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 May 12, 2017 (the "Motion to Continue"),¹ and the Estate Representative having no objection 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 May 12, 2017 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.

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

Dated: _____, 2017.

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

Exhibit B
Continued Claims (4)

Claim No.	Claimant Name	Claim Amount (if applicable)
524	Audet, Beland	N/A
547	Beland Audet on behalf of Logi-Bel	N/A
554	Roy, Rejean	N/A
574	Gagne, Lisandra Arencibia Tamayo	N/A