

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

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| _____ |) | |
| In re |) | Chapter 11 |
| |) | Case No. 13-10670 |
| MONTREAL MAINE & ATLANTIC |) | |
| RAILWAY, LTD. |) | |
| |) | |
| Debtor. |) | |
| _____ |) | |

**CONSENT APPLICATION TO ENLARGE TIME FOR UNITED STATES TRUSTEE
TO FILE RESPONSE SECOND INTERIM APPLICATION OF TRUSTEE, ROBERT J.
KEACH, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
AUGUST 21, 2013 THROUGH SEPTEMBER 30, 2014**

The United States Trustee, pursuant to Fed. R. Bankr. P. 9006(b)(1) and D. Me. LBR 9006-1 and 9013-1, hereby moves the Court for an extension of time for the United States Trustee to file a response to the Second Interim Application of Trustee, Robert J. Keach, for Allowance and Payment of Compensation and Reimbursement for Expenses for the Period from August 21, 2013 through September 30, 2014 (the "Second Interim Compensation Application"), from November 10, 2014 to and including November 17, 2014. **The Trustee, Robert J. Keach, consents to the relief requested in this Motion.**

1. On October 24, 2014, counsel for the Trustee, Bernstein, Shur, Sawyer & Nelson, P.A. ("Trustee's Counsel") filed the Second Interim Compensation Application. Docket Entry No. 1170.

2. On October 30, 2014, Trustee's Counsel filed a Motion to Expedite the hearing on, *inter alia*, the Second Interim Compensation Application, for November 18, 2014, and set an objection deadline of November 10, 2014. Docket Entry No. 1179.

3. In accordance with the duties imposed on him by virtue of 28 U.S.C. § 586 and section 307 of the United States Bankruptcy Code, the United States Trustee has conducted a thorough review of the Second Interim Compensation Application.

4. Consistent with the practice in this case, the United States Trustee and the Trustee have scheduled a time to discuss concerns and comments the United States Trustee has with respect to the Second Interim Compensation Application.

5. Although the United States Trustee is hopeful his concerns will be adequately addressed by the Trustee, he seeks an extension of the deadline to formally respond to the Second Interim Compensation Application, should the need arise.

6. The Trustee consents to the extension of the deadline to respond to the Second Interim Compensation Application, from November 10, 2014 to, and including, November 17, 2014.

7. The United States Trustee has not sought any other enlargements of time with respect to the Second Interim Compensation Application.

8. As previously stated, the Trustee consents to the enlargement. No other parties-in-interest have been consulted.

WHEREFORE, the United States Trustee respectfully requests that the foregoing Application be GRANTED and that the deadline by which he is required to respond to the Second Interim Compensation Application be extended from November 10, 2014 to, and including, November 17, 2014.

Dated at Portland, Maine this 7th day of November, 2014.

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Stephen G. Morrell
Stephen G. Morrell, Esq.
Jennifer H. Pincus, Esq.
United States Department of Justice
Office of United States Trustee
537 Congress Street, Suite 303
Portland, ME 04101
PHONE: (207) 780-3564

CERTIFICATE OF SERVICE

I, Jennifer H. Pincus, being over the age of eighteen and an employee of the United States Department of Justice, U.S. Trustee Program, hereby certify that on November 7, 2014, I electronically filed the forgoing Consent Application to Extend Deadline for the United States Trustee to Respond to the Second Interim Application of Trustee, Robert J. Keach, for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period August 21, 2013 through September 30, 2014, a Proposed Order, and this Certificate of Service, which were served upon each of the parties set forth on this Service List via U.S. mail, postage prepaid, on November 7, 2014. All other parties listed on the Notice of Electronic Filing have been served electronically.

Dated at Portland, Maine this 7th day of November, 2014.

/s/ Jennifer H. Pincus

Service List:

N/A

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**ORDER GRANTING
CONSENT APPLICATION TO ENLARGE TIME FOR UNITED STATES TRUSTEE
TO FILE RESPONSE SECOND INTERIM APPLICATION OF TRUSTEE, ROBERT J.
KEACH, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
AUGUST 21, 2013 THROUGH SEPTEMBER 30, 2014**

The Court having before it the November 7, 2014 Consent Application to Enlarge Time for United States Trustee to File Response to Second Interim Application of Trustee, Robert J. Keach, for Allowance and Payment of Compensation and Reimbursement for Expenses for the Period from August 21, 2013 through September 30, 2014 (the "Second Interim Compensation Application"); the Trustee, Robert J. Keach, consenting to the relief requested in the Consent Application; and the United States Trustee having demonstrated that cause exists to grant the Application; it is hereby ORDERED, JUDGED, and DECREED, as follows:

1. The United States Trustee shall have until November 17, 2014 to respond to the Second Interim Compensation Application.
2. 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.

Date _____

Louis H. Kornreich
Chief Judge
United States Bankruptcy Court
District of Maine