

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 MOTIONS FOR RULE 2004 EXAMINATIONS**

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 a response or objection (the "Objection Deadline") with respect to the following motions (collectively, the "Rule 2004 Motions"):

- *Motion for Order Compelling Trinity Industries, Inc. to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1145];
- *Motion for Order Compelling Trinity Rail Group, LLC to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1146];
- *Motion for Order Compelling Trinity Rail Leasing 2012 LLC to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1147];
- *Motion for Order Compelling General Electric Railcar Services Corporation to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1148];
- *Motion for Order Compelling Union Tank Car Company to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1149];
- *Motion for Order Compelling SMBC Rail Services, LLC to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1150]; and
- *Motion for Order Compelling First Union Rail to Appear for Rule 2004 Examination and to Produce Documents in Connection Therewith* [D.E. 1151].

In further support of this consented-to motion, the Trustee states as follows:

1. The Objection Deadline is currently November 4, 2014. The hearing on the Rule 2004 Motions is scheduled for November 18, 2014.

2. Counsel for (i) Trinity Industries, Inc., (ii) Trinity Rail Group, LLC, (iii) Trinity Rail Leasing 2012 LLC, (iv) General Electric Railcar Services Corporation, (v) Union Tank Car Company, (vi) SMBC Rail Services, LLC, and (vii) First Union Rail (collectively, the “Requesting Parties”) have all requested an extension of the Objection Deadline to Tuesday, November 12, 2014. The Trustee consents to such request.

WHEREFORE, the Trustee respectfully requests that the Court extend the Objection Deadline to November 12, 2014 for the parties listed in paragraph 2 above, and grant such other and further relief as may be granted.

Dated: November 4, 2014

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

By his attorneys:

/s/ Timothy J. McKeon

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FOR THE DISTRICT OF MAINE**

In re:

MONTREAL, MAINE & ATLANTIC
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**ORDER GRANTING CONSENT MOTION TO EXTEND THE DEADLINE
TO RESPOND TO THE TRUSTEE'S MOTIONS
FOR RULE 2004 EXAMINATIONS**

Upon consideration of the *Consent Motion to Extend the Deadline to Respond to the Trustee's Motions for Rule 2004 Examinations* (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 Requesting Parties consenting to the relief sought in the Consent Motion, and without hearing pursuant to D. Me. LBR 9013-1(d)(1) and Fed. R. Bankr. P. 9006(b)(1), it is hereby **ORDERED**, **ADJUDGED** and **DECREED** as follows:¹

1. The Consent Motion is granted.
2. The Objection Deadline is extended, as it relates only to the Requesting Parties, up to and including **November 12, 2014**.

Dated:

The Honorable Louis H. Kornreich
United States Bankruptcy Judge

¹ Unless otherwise indicated, all capitalized terms used but not defined herein have the same meaning as ascribed to such terms in the Consent Motion.