

***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

**SECOND 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. On November 4, 2014, the Trustee filed the *Consent Motion to Extend the Deadline to Respond to the Trustee's Motions for Rule 2004 Examinations* [D.E. 1186] (the "Consent Motion"), which proposed to extend the Objection Deadline from November 4, 2014 to November 12, 2014. On November 6, 2014, the Court entered an order granting the Consent Motion [D.E. 1200]. 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 a further extension of the Objection Deadline to Tuesday, November 17, 2014. The Trustee consents to such request.

WHEREFORE, the Trustee respectfully requests that the Court extend the Objection Deadline to November 17, 2014 for the parties listed in paragraph 2 above, and grant such other and further relief as may be granted.

Dated: November 12, 2014

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

By his attorneys:

/s/ Timothy J. McKeon  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MAINE**

In re:

MONTREAL, MAINE & ATLANTIC  
RAILWAY, LTD.,

Debtor.

Bk. No. 13-10670

Chapter 11

**ORDER GRANTING SECOND CONSENT MOTION TO EXTEND THE  
DEADLINE TO RESPOND TO THE TRUSTEE'S MOTIONS  
FOR RULE 2004 EXAMINATIONS**

Upon consideration of the *Second Consent Motion to Extend the Deadline to Respond to the Trustee's Motions for Rule 2004 Examinations* (the "Second 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 Second 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:<sup>1</sup>

1. The Second Consent Motion is granted.
2. The Objection Deadline is extended, as it relates only to the Requesting Parties, up to and including **November 17, 2014**.
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.

Dated:

\_\_\_\_\_  
The Honorable Louis H. Kornreich  
United States Bankruptcy Judge

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