

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 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 July 26, 2016 the hearing on the Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. [D.E. 1820] (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 October 14, 2015, Tafisa filed a Motion for Extension of Time to File Proof of Claim. A hearing is scheduled to take place on the Application on July 26, 2016, at 9:00 a.m. at the Bankruptcy Court in Portland, Maine.

2. On November 10, 2015, the Debtor filed its Objection to Motion for Extension of Time to File Proof of Claim [D.E. 1845] (the “Objection”).

3. 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 August 30, 2016 to accommodate further discussions.

4. 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.

5. 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 August 30, 2016 at 9:00 a.m. and (2) granting such further relief as this Court deems necessary and appropriate.

Dated: July 11, 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 July 11, 2016.

/s/ Mitchell A. Toups
Mitchell A. Toups