Relief Requested Without Hearing

UNITED STATES BANKRUPTCY COURT DISTRICT OF MAINE

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MONTREAL MAINE & ATLANTIC RAILWAY LTD.,

Chapter 11 Case No. 13-10670

Debtor.

UNOPPOSED MOTION TO CONTINUE HEARING WITH RESPECT TO SUPPLEMENTAL MOTION FOR EXTENSION OF TIME TO FILE PROOF OF CLAIM BY CREDITOR TAFISA CANADA, INC.

Tafisa Canada, Inc., the Credit (the "<u>Creditor</u>") in the above-captioned chapter 11 case, by and through its undersigned counsel, hereby files this motion seeking an order continuing until April 4, 2017, the hearing on the Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. [D.E. 2223] (the "<u>Motion</u>") filed by Tafisa Canada, Inc. ("<u>Tafisa</u>"). Robert J. Keach, the estate representative for the post-effective date estate (the "<u>Estate Representative</u>") of Montreal, Maine & Atlantic Railway, Ltd. (the "<u>Debtor</u>") does not object to the relief requested herein. By way of further support, the Creditor states as follows:

- 1. On August 18, 2016, Tafisa filed the Motion. A hearing is scheduled to take place on the Application is currently scheduled for on April 4, 2017, at 9:00 a.m. at the Bankruptcy Court in Portland, Maine.
- 2. 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. The reason for the delay is that the Administrator, Richter Group in Canada is still evaluating claims and neither the

Administrator or the Bankruptcy Trustee can decide at this time whether an agreement to allow the Tafisa late claim will detrimentally impact the economic claims that were timely filed. There are also many appeals which have held up the Economic Claims being finalized. Accordingly, the parties seek to continue the hearing on the Motion to May 23, 2017, to accommodate further discussions.

3. The Estate Representative does not object to said continuance.

WHEREFORE, the Creditor respectfully requests that this Court enter an order (1) continuing the hearing on the Application until May 23, 2017, at 9:00 a.m. and (2) granting such further relief as this Court deems necessary and appropriate.

Dated: March 31, 2017 TAFISA CANADA, INC.

By its attorneys:

/s/ Mitchell A. Toups, Esq.

Mitchell A. Toups, Esq.

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/s/ George W. Kurr, Jr.

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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 March 31, 2017.

/s/ Mitchell A. Toups Mitchell A. Toups

UNITED STATES BANKRUPTCY COURT DISTRICT OF MAINE

In re: MONTREAL MAINE & ATLANTIC RAILWAY, LTD.	\$ \$ \$	CHAPTER 11 CASE NO. 13-10670
ORDER ON SUPPLEMENTAL MOTIO TO SUPPLEMENTAL MOTION FOR CLAIM BY CREDIT	R EXTENSION O	F TIME TO FILE PROOF OF
Upon consideration of the Motion		
Motion for Extension of Time to File Proof		
ORDERED, ADJUDGED AND DECREEL	O that	
1. The Motion to Continue Hearing	g is GRANTED.	
2. The hearing on the Motion to Co	ontinue will be held	on Tuesday, May 23, 2017, at 9:00
a.m. at the U.S. Bankruptcy Cour	rt, 537 Congress Str	eet, Second Floor, Portland, Maine.
3. Any objections to the Motion to	Continue must be t	filed by Monday, May 22, 2017.
Dated:		

HONORABLE U.S. BANKRUPTCY JUDGE

Case 13-10670 Doc 2330-2 Filed 03/31/17 Entered 03/31/17 15:08:26 Desc Certificate of Service Page 1 of 2

UNITED STATES BANKRUPTCY COURT DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC RAILWAY LTD.,

Debtor.

Chapter 11 Case No. 13-10670

CERTIFICATE OF SERVICE ON UNOPPOSED MOTION TO CONTINUE HEARING WITH RESPECT TO SUPPLEMENTAL MOTION FOR EXTENSION OF TIME TO FILE PROOF OF CLAIM BY CREDITOR TAFISA CANADA, INC.

I hereby certify that on March 31, 2017, I filed the Unopposed Motion to Continue Hearing with Respect to Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. I further certify that on March 31, 2017, I filed the Proposed Order on the Motion to Continue Hearing with Respect to Supplemental Motion for Extension of Time to File Proof of Claim by Creditor, Tafisa Canada, Inc. I further certify that I caused copies of the Motion and the proposed Order to be served via electronic mail through this Court's e-file system.

Dated: March 31, 2017 TAFISA CANADA, INC.

By its attorneys:

/s/ Mitchell A. Toups, Esq.
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