

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

In re:

MONTREAL MAINE & ATLANTIC  
RAILWAY, LTD.

Debtor.

Bk. No. 13-10670  
Chapter 11

**CONSENT MOTION TO EXTEND THE DEADLINE FOR  
ROBERT J. KEACH TO FILE FINAL FEE APPLICATION**

Robert J. Keach, the chapter 11 trustee (the “Trustee”) in the above-captioned case, hereby files this motion (the “Consent Motion”), with the consent of the Office of the United States Trustee (the “U.S. Trustee”), to extend the deadline for the Trustee to file his final application (the “Final Fee Application”) for compensation for services rendered or reimbursement of expenses incurred under sections 326, 328 and 330 of title 11 of the United States Code (the “Bankruptcy Code”). In support of the Consent Motion, the Trustee states as follows:

1. On August 7, 2013 (the “Petition Date”), Montreal Maine & Atlantic Railway, Ltd., the above-captioned debtor (the “Debtor”), filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On August 21, 2013, the United States Trustee appointed Robert J. Keach to serve in the Debtor’s chapter 11 case pursuant to 11 U.S.C. § 1163.

2. On October 9, 2015, this Court entered an order [D.E. 1801] (the “Confirmation Order”) confirming the *Trustee’s Revised First Amended Plan of Liquidation Dated July 15, 2015 (As Amended on October 8, 2015)* [D.E. 1822] (the “Plan”).

3. The effective date of the Plan occurred on December 22, 2015 (the “Effective Date”). See D.E. 1927.

4. Pursuant to Section 2.2 of the Plan, all persons seeking an award by the Bankruptcy Court of compensation for services rendered or reimbursement of expenses incurred through and including the Effective Date under sections 326, 328, 330, and 331 of the Bankruptcy Code must file their final applications for allowance of compensation for services rendered and reimbursement of expenses incurred no later than February 19, 2016.

5. The Trustee and the U.S. Trustee are in discussions regarding the Trustee's Final Fee Application. In light of those discussions, the Trustee requests an extension of his deadline to file his Final Fee Application in the hopes of reaching consensus with the U.S. Trustee on the content of his Final Fee Application. Thus, by this Consent Motion, the Trustee—with the consent of the U.S. Trustee—requests that the Court extend the deadline for the Trustee to file his Final Fee Application to **March 8, 2016**.

**WHEREFORE**, the Trustee respectfully requests that this Court enter an Order: (a) granting the Consent Motion; (b) extending the Trustee's deadline to file his Final Fee Application to March 8, 2016; and (c) granting such other and further relief as the Court deems just and equitable under the circumstances.

Dated: February 16, 2016

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

By his attorneys:

/s/ Sam Anderson  
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In re:

MONTREAL MAINE & ATLANTIC  
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Bk. No. 13-10670

Chapter 11

**ORDER GRANTING CONSENT MOTION TO EXTEND THE DEADLINE FOR  
ROBERT J. KEACH TO FILE FINAL FEE APPLICATION**

This matter having come before the Court on the *Consent Motion to Extend the Deadline for Robert J. Keach to file Final Fee Application* (the “Consent Motion”)<sup>1</sup> filed by Robert J. Keach, the chapter 11 trustee (the “Trustee”) in the above-captioned case, and upon consideration of any responses to the Consent Motion, and after due deliberation and sufficient cause appearing therefore; it is hereby **ORDERED**, **ADJUDGED**, and **DECREED** as follows:

1. The Consent Motion is granted.
2. The deadline for the Trustee to file his Final Fee Application shall be extended to

**March 8, 2016.**

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: \_\_\_\_\_, 2016

\_\_\_\_\_  
**Honorable Peter J. Cary**  
**Chief Judge, United States Bankruptcy Court**

<sup>1</sup> Capitalized terms used but not defined in this Order shall have the meanings ascribed to such terms in the Consent Motion.