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Admitted in: ME, MA, NY

August 26, 2021

HAND DELIVERED

Matthew Pollack, Esq.
Clerk of the Law Court
Maine Supreme Judicial Court
205 Newbury Street, Room 139
Portland, ME 04101

Re: *Russell Black, et al. v. Bureau of Parks and Lands, et al.*
Docket No. BCD-21-257

Dear Mr. Pollack:

Enclosed for filing in the above-referenced action, please find the original and one copy of Appellants Central Maine Power Company and NECEC Transmission LLC's Consented to Motion to Extend Time to Reply to Motion to Lift Stay.

Thank you for your attention to this matter.

Sincerely,



Nolan L. Reichl

Enclosures

cc: Via Email and U.S. Mail
James T. Kilbreth, Esq.
David M. Kallin, Esq.
Adam R. Cote, Esq.
Jeana M. McCormick, Esq.
Lauren E. Parker, AAG
Scott W. Boak, AAG

RECD ME SUPREME JUD CT
AUG 26 '21 PM2:52

STATE OF MAINE

SUPREME JUDICIAL COURT
Sitting as the Law Court
DOCKET NO. BCD-21-257

RUSSELL BLACK, et al. Appellees v. BUREAU OF PARKS AND LANDS, et al. Appellants
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**APPELLANTS CENTRAL MAINE
POWER COMPANY AND NECEC
TRANSMISSION LLC'S
CONSENTED TO MOTION TO
EXTEND TIME TO REPLY TO
MOTION TO LIFT STAY**

Pursuant to M.R. App. P. 10(a)(2), Appellants Central Maine Power Company and NECEC Transmission LLC (together “NECEC LLC”), with the consent of all parties, hereby move this Court for an extension of the deadline to respond to Appellees/Cross-Appellants Motion to Lift Automatic Stay Pending Appeal. In support of this Motion, NECEC LLC states as follows:

1. On Tuesday, August 24, 2021, Appellees Black et al. filed a Motion to Lift the Automatic Stay Pending Appeal with respect to the automatic stay of the effectiveness of the Superior Court’s judgment in this matter, in place by operation of M.R. Civ. P. 62(e).

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2. Pursuant to M.R. App. P. 1A and 10(c), the deadline by which NECEC LLC and the Bureau of Parks and Lands and Bureau Director Andy Cutko (together the “Bureau”) must file their respective responses is Tuesday, August 31, 2021.

3. Following a vacation on Monday and Tuesday of this week, lead counsel for NECEC LLC traveled to New Jersey for a lengthy medical procedure on Wednesday and has returned to Maine today to rest and recover for the remainder of the week.

4. Given the foregoing, NECEC LLC respectfully requests the Court extend the deadline to oppose the pending motion by three additional days, up to and including Friday, September 3, 2021.

5. Counsel for NECEC LLC contacted counsel for the Bureau and for Appellees Black et al., who stated their clients’ consent to this request and the relief sought herein.¹

WHEREFORE, NECEC LLC respectfully requests that this Court extend the deadline to respond to the Motion to Lift Automatic Stay Pending Appeal up to and including Friday, September 3, 2021.

¹ The Bureau not only consents to this motion, but counsel for the Bureau has asked undersigned counsel to represent the Bureau’s desire to receive an extension of the same duration. Appellees Black et al. have consented to the Bureau’s request. Accordingly, NECEC LLC respectfully suggests the Court enlarge the response deadline for both NECEC LLC and the Bureau.

DATED: August 26, 2021



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*Attorney for Appellants/Cross-Appellees Central
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NECEC Transmission LLC*

CERTIFICATE OF SERVICE

I, Nolan L. Reichl, Esq., hereby certify that a copy of Appellants Central Maine Power Company and NECEC Transmission LLC's Consented to Motion to Lift Automatic Stay Pending Appeal was served upon counsel at the address set forth below by email and first class mail, postage-prepaid on August 26, 2021:

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DATED: August 26, 2021



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