

EXHIBIT D

STATE OF MAINE
AROOSTOOK, ss

SUPERIOR COURT
LOCATION: CARIBOU
CIVIL ACTION
DOCKET NO.

JOSEPH P. KELLY, MANDA L. KELLY, and
CARA L. MERRILL,

Plaintiffs,

v.

ALLAGASH TIMBERLANDS, LP,

Defendant.

**CONSENTED-TO MOTION FOR
ENLARGEMENT OF TIME TO ANSWER
COMPLAINT**

Pursuant to Rule 6(b) of the Maine Rules of Civil Procedure, Defendant Allagash Timberlands, LP (“Allagash”) moves to extend its time to answer or otherwise respond to Plaintiffs’ Complaint to April 17, 2026. In support of this Motion, Allagash states as follows:

1. Allagash was served with Plaintiffs’ Complaint on February 26, 2026, making its current answer deadline March 18, 2026.
2. This Motion is therefore made before Allagash’s original time to respond.
3. Allagash requires additional time to review the complaint and prepare its defenses.
4. The requested extension will not prejudice any party to this case.
5. Allagash has conferred with counsel for Plaintiffs, who has indicated his consent to the requested extension.

WHEREFORE, Allagash respectfully requests that the Court grant the instant motion and enlarge the time within which Allagash may file its response to Plaintiff’s Complaint to April 17, 2026.

DATED: March 12, 2026

/s/ Nolan L. Reichl

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