

STATE OF MAINE  
WALDO, ss.

SUPERIOR COURT  
CIVIL ACTION  
DOCKET NO. WALSC-RE-2021-007

JEFFREY R. MABEE, JUDITH GRACE, )  
 THE FRIENDS OF THE HARRIET L. )  
 HARTLEY CONSERVATION AREA, and )  
 UPSTREAM WATCH, )  
 )  
 ) Petitioners/Plaintiffs, )  
 )  
 ) and )  
 )  
 ) AARON M. FREY, ATTORNEY GENERAL )  
 )  
 ) Intervenor-Plaintiff, )  
 )  
 ) v. )  
 )  
 ) CITY OF BELFAST, MAINE, )  
 )  
 ) Respondent/Defendant, )  
 )  
 ) and )  
 )  
 ) NORDIC AQUAFARMS, INC., )  
 )  
 ) Intervenor-Defendant. )

**ATTORNEY GENERAL’S  
 MOTION TO FURTHER  
 ENLARGE HIS DEADLINE TO  
 ANSWER OR RESPOND TO  
 THE CITY OF BELFAST’S  
 COUNTERCLAIM**

NOW COMES Intervenor-Plaintiff Aaron M. Frey, Attorney General of the State of Maine (the Attorney General), and moves this Court, pursuant to M.R. Civ. P. 6(b) and 7, to further enlarge the deadline to answer or respond to the City of Belfast’s counterclaim dated January 11, 2022, until 45 days after the date of the Court’s order(s) deciding the Attorney General’s Consented-To Motion to Enter and Make Findings on the Parties’ Stipulated Judgment and Dismissal Without Prejudice. All other parties consent to this motion and the Attorney General’s requested relief. In support of this motion the Attorney General states as follows:

On January 26, 2022, the Court granted the Attorney General’s prior motion to enlarge the deadline to answer or respond to the City’s counterclaim to February 28, 2022, to allow for settlement discussions. As a result of those discussions, the parties have agreed to and executed a

Stipulated Judgment and Dismissal Without Prejudice (the Stipulation) that, if approved by this Court, would resolve the two counts pleaded in the Attorney General's complaint and the City's counterclaim against the Attorney General and obviate the need for the Attorney General to answer or otherwise respond to the City's counterclaim.

Thus, the Attorney General moves this Court for an additional enlargement of the deadline to answer or otherwise respond to the City's counterclaim in the event the Court either does not act on or denies the Attorney General's motion regarding the Stipulation by the current answer/response deadline of February 28, 2022. Specifically, the Attorney General moves this Court to extend until 45 days after the date of the Court's order(s) on the Stipulation the Attorney General's deadline for answering or otherwise responding to the City's counterclaim.

Counsel for the City, plaintiffs, and Nordic Aquafarms, Inc. each represent that they consent to this motion and the Attorney General's requested relief.

Dated: February 18, 2022

Respectfully submitted,

AARON M. FREY,  
Attorney General



---

Scott W. Boak  
Assistant Attorney General  
Maine Bar No. 9150  
207-626-8566  
[scott.boak@maine.gov](mailto:scott.boak@maine.gov)

Lauren E. Parker  
Assistant Attorney General  
Maine Bar No. 5073  
207-626-8878  
[lauren.parker@maine.gov](mailto:lauren.parker@maine.gov)

Office of the Attorney General  
6 State House Station  
Augusta, Maine 04333-0006

**NOTICE**

**MATTER IN OPPOSITION TO THIS MOTION MUST BE FILED NOT LATER THAN 21 DAYS AFTER THE FILING OF THIS MOTION UNLESS ANOTHER TIME IS PROVIDED BY THE MAINE RULES OF CIVIL PROCEDURE OR IS SET BY THE COURT. FAILURE TO FILE TIMELY OPPOSITION WILL BE DEEMED A WAIVER OF ALL OBJECTIONS TO THE MOTION, WHICH MAY BE GRANTED WITHOUT FURTHER NOTICE OR HEARING.**

