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Hearing Date: TBD, if necessary
Hearing Time: TBD
Objection Date: TBD

And

Shawn M. Christianson, Esq.
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PARETEUM CORPORATION, et. al.,

Debtors.

Chapter 11

Case No. 22-10615 (LGB)

Jointly Administered

REQUEST FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSES

Oracle Credit Corporation and Oracle America, Inc. (jointly "Oracle"), a creditor and contract counter-party in the above-captioned jointly administered cases, hereby requests allowance and payment of an administrative expense in the amount of \$101,319.12 pursuant to sections 503(a) and (b) of the Bankruptcy Code (the "Administrative Request"), for post-petition goods and products provided, and services rendered, by Oracle to Pareteum Corporation, *et al.* ("Debtors").

1. Oracle is a licensor of computer software and provides software related products, technical support, maintenance, educational materials, and programs, as well as cloud-based services, which Oracle often customizes to meet the customer's specific needs.



2. Debtors filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on May 15, 2022 (the “Petition Date”).

3. On August 3, 2022, the Debtors filed their *Sixth Notice of Rejection of Executory Contracts and/or Unexpired Leases* [Dkt. No. 263] (“Rejection Notice”). Pursuant to the Rejection Notice, the Debtors rejected the following agreements (the “Oracle Agreements”).

Counterparty	Address	Description
Oracle America, Inc.	500 Oracle Parkway, Redwood Shores, CA 94065	Cloud Services Agreement v 040119; Contract No. 15367173-1000; and Order No. 9518404
Oracle Credit Corporation	500 Oracle Parkway, Redwood Shores, CA 94065	Payment Schedule No.140313; and Payment Plan Agreement No. 3775

4. Rejection of the Oracle Agreements was effective August 3, 2022 (“Rejection Date”).

5. Debtors owe Oracle \$101,319.12, for support services which Oracle provided to the Debtors after the Petition Date, and prior to the Rejection Date. These post-petition services are evidenced by the outstanding invoice (“Invoice”) which is attached hereto as **Exhibit A**.

6. Oracle asserts that the Debtors used Oracle’s services through the Rejection Date. Therefore, Oracle provided ongoing tangible value to the Debtors’ estate.

7. Oracle also filed a rejection damages claim which includes the amount reflected on the Invoice. Oracle is not seeking a duplicative recovery. Oracle believes the services are entitled to administrative treatment. However, to the extent any portion of the sum owing is not allowed as an administrative expense, Oracle seeks to ensure such sums are allowed, alternatively, as rejection damages.

WHEREFORE, Oracle respectfully requests allowance and payment of an administrative expense to Oracle in an amount of not less than \$101,319.12, and reserves its rights to supplement this Administrative Request if additional unpaid administrative amounts accrue.

Dated: September 16, 2022
Lake Success, New York

Respectfully submitted,

By: /s/ Amish R. Doshi
Amish R. Doshi, Esq.
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Peggy Bruggman, Esq.
Benjamin Wheeler, Esq.
ORACLE AMERICA, INC.
500 Oracle Parkway
Redwood City, California 94065

Attorneys for Oracle America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2022, I served a copy of *Request For Allowance and Payment of Administrative Expenses* on the parties listed on the attached service list via email containing a pdf of the document. In addition, the parties entitled to receive notice by the Court's CM-ECF system were sent an email notification of such filing by the Court's CM-ECF System.

/s/ Amish R. Doshi

SERVICE LIST

Thaddeus D. Wilson, Esq. – thadwilson@kslaw.com Frank A. Oswald, Esq. – frankoswald@teamtogut.com

EXHIBIT A

INVOICES



Invoice Original Invoice Pg 2 of 3
ISSUED 05/17/22

FINANCING

BANC OF AMERICA LEASING
LEASE ADMINISTRATION CENTER
PO BOX 405874
ATLANTA, GA 30384-5874

**INVOICED IN
US DOLLARS**

Date Due: 06/01/22
Invoice No. 12890448R
Previous Amt Due: \$101,319.72 USD
Current Amt Due: \$101,319.72 USD
Total Amt Due: \$202,639.44 USD

For change of address,
please e mail/fax Customer Service.

0200576 NX 1496 -C01-P00000-I



IPASS INC
1185 AVENUE OF THE AMERICAS
2ND FLOOR
NEW YORK, NY 10036
UNITED STATES

BANC OF AMERICA LEASING
LEASE ADMINISTRATION CENTER
PO BOX 405874
ATLANTA, GA 30384-5874

For assistance with your invoice:	PHONE	FAX	TIME	E-MAIL
CUSTOMER SERVICE INQUIRIES	800-959-5936	866-939-4705	8:30AM - 5:00PM EASTERN	customersvc@leaseadmincenter.com

ORACLE IS A REGISTERED TRADEMARK OF ORACLE AND/OR ITS AFFILIATES. USED UNDER LICENSE.
CONTACT US TO HAVE THIS INVOICE EMAILED

Federal Tax ID: 0
Invoice Number 12890448R-62

Contract Number (Please see below)							
Customer Reference Number							
Description							
Model Number	Location	Detailed Charge Description	Payment Due Date	Payment Amount	Tax	Total Due	
ORACLE PAYMENT SCHEDULE 140313TO PPA 3775							
ORACLE ORDER # CPQ 1798956 1							
500-3211794-000							
Your Ref:	3800 BRIDGE PARKWAY	PAYMENT	06/01/22	101,319.72		101,319.72	
ORACLE FUSION CLOUD		REDWOOD CITY, CA 940					
CONTRACT SUBTOTAL						\$101,319.72	

TOTAL CURRENT CHARGES \$101,319.72 USD

Please contact our Customer Service Department with any questions you have regarding this invoice. We are available Monday through Friday from 8:30AM to 5:00PM EST at the number provided on the opposite side of this invoice.

Additional information regarding your invoice:

CONTRACT NUMBER: This is the number we use to identify your account. Please include this number when making an inquiry to Customer Service and on all correspondence.

CUSTOMER REFERENCE NUMBER: Any reference number provided by you such as: Purchase Order, Department, Cost Center Number, etc. Please contact Customer Service to add or update this information.

CHANGE OF BILLING ADDRESS OR EQUIPMENT LOCATION: Please send all notices of address change in writing to Customer Service.

GST/PST and/or HST (CANADA ONLY): Assessed by your local taxing authority and added to your contract payment.

CALIFORNIA E-WASTE FEE (U.S. ONLY): If you live in California, state law requires you to recycle your covered electronic device. You can find how to return, recycle and dispose of a covered electronic device at www.ciwmb.ca.gov/PublicEd/.

AUDIT CONFIRMATION REQUESTS: These requests may be submitted using the Capital Confirmation Inc. (CCI) service. Your auditor will need to register for the CCI service at www.confirmation.com and submit your audit confirmation request electronically.

GO PAPERLESS: If you wish to receive your invoices via email, please contact our Customer Service Department.

WRITTEN CORRESPONDENCE: Please direct any written correspondence which cannot be delivered via email to: PO Box 405874 Atlanta GA 30384 5874. Please contact Customer Service if you require a physical address.