

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:  PARETEUM CORPORATION, <i>et al.</i> ,  Debtors.	Chapter 11  Case No. 22-10615 (LGB)  (Jointly Administered)  Adv. Pro. No. 22-01177 (LGB)
ANTHONY M. SACCULLO, in his capacity as the Liquidation Trustee for the TEUM LIQUIDATING TRUST,  Plaintiff,  v.  ROBERT H. TURNER, VICTOR BOZZO, YVES VAN SANTE, EDWARD O'DONNELL, DENIS MCCARTHY, and ROBERT MUMY,  Defendants.	

**AMENDED NOTICE OF MOTION TO STAY THIS ACTION OR  
IN THE ALTERNATIVE FOR AN INTERIM STAY EXTENDING  
THE DEADLINE TO RESPOND TO THE COMPLAINT**

**PLEASE TAKE NOTICE**, that the defendant Edward O'Donnell, by and through his undersigned counsel, will move before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, whose courtroom is located at the United States Bankruptcy Court, the Alexander Hamilton Customs House, Once Bowling Green, Courtroom 601, New York, New York 10004, on **July 11, 2023 at 10:00a.m.**, or as soon thereafter as counsel may be heard, seeking entry of an order, pursuant to section 105(a) of title 11 of the United States Code (the "Bankruptcy Code") and Federal Rules of Bankruptcy Procedure ("Bankruptcy Rule") 7012 or 9006 staying



this action, or, in the alternative, for an interim stay extending the deadline to respond to the Complaint, as set forth in the Motion to Stay this Action or in the Alternative for an Interim Stay Extending the Deadline to respond to the Complaint (the “Motion”) [ECF Docket No. 27].

**PLEASE FURTHER TAKE NOTICE** that pursuant to the Court’s directive, all hearings will be conducted remotely pending further of the Court via Zoom for Government. All parties who wish to participate in the Hearing must refer to Judge Beckerman’s guidelines for remote appearances, which can be located at:

[https://www.nysb.uscourts.gov/sites/default/files/Judge\\_Beckerman\\_Zoom\\_Procedures.pdf](https://www.nysb.uscourts.gov/sites/default/files/Judge_Beckerman_Zoom_Procedures.pdf)

Parties should not appear in person.

**PLEASE FURTHER TAKE NOTICE** that Gen. Ord. M-543, along with other temporary procedures implemented by the Bankruptcy Court in connection with the COVID-19 pandemic (including electronic filing procedures for pro se parties) can be found by visiting [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) and clicking on the “Coronavirus COVID-19 Protocol” banner.

**PLEASE FURTHER TAKE NOTICE** that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, Once Bowling Green, New York, New York 10004 by no later than 5:00p.m. on June 30, 2023 (with a courtesy copy delivered to the Chambers of the Honorable Lisa G. Beckerman) and must be served upon McLaughlin & Stern, LLP, 260 Madison Avenue, New York, NY 10016, Attn: Tracy Burnett, Esq.

**PLEASE FURTHER TAKE NOTICE** that failure to file timely objections may result in the entry of an order granting the relief in the Motion without further notice to any party or an opportunity to be heard.

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Dated: June 14, 2023  
New York, New York

Respectfully submitted,

/s/ Tracy Burnett

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