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

In re:

Chapter 11

PARETEUM CORPORATION, *et al.*,

Case No. 22-10615 (LGB)

Debtors.

(Jointly Administered)

ANTHONY M. SACCULLO, in his capacity
as the Liquidation Trustee for the TEUM
LIQUIDATING TRUST,

Plaintiff,

Adv. Pro. No. 22-01177 (LGB)

v.

ROBERT H. TURNER, VICTOR BOZZO,
YVES VAN SANTE, EDWARD O'DONNELL,
DENIS MCCARTHY, and ROBERT MUMBY,

Defendants.

NOTICE OF APPEAL

Defendant Edward O'Donnell, by and through his undersigned counsel, hereby appeals to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. 158(a) and Rules 8002 and 8003 of the Federal Rules of Bankruptcy Procedure, from the Order Denying (1) Motion To Stay This Action Or In The Alternative For An Interim Stay Extending The Deadline to Respond To the Complaint (ECF No. 24) And (2) Defendant Edward O'Donnell's Motion To Stay This Action Or In The Alternative For An Interim Stay Extending



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The Deadline To Respond To The Complaint (ECF No. 27), which was signed by the Honorable Lisa G. Beckerman and entered in the above-captioned adversary proceeding on July 17, 2023 (ECF No. 34) (the “Order”). A true and correct copy of the Order is attached as Exhibit A.

The names of all parties to the Order, and the names, addresses, and telephone numbers of their respective attorneys are as follows:

Party	Attorneys
Anthony Saccullo, in his capacity as the Liquidation Trustee for the TEUM Liquidating Trust	<p>Bast Amron LLP One Southeast Third Avenue, Suite 2410 Miami, FL 33131 Tel.: (305) 379-7904 Attn: Brett Amron, Esq. Peter J. Klock, II, Esq. Jaime B. Leggett, Esq.</p> <p>Cole Schotz P.C. Court Plaza North 25 Main Street Hackensack, NJ 07601 Tel.: (201) 489-3000 Attn: Krista Kulp, Esq. Cameron Welch, Esq.</p> <p>1325 Avenue of the Americas 19th Floor New York, NY 10019 Tel.: (212) 752-8000 Attn: Seth Van Aalten, Esq.</p>
Robert H. Turner Edward O’Donnell Victor Bozzo Yves Van Sante Denis McCarthy Robert H. Mumby	<p>Baker & Hostetler LLP 45 Rockefeller Plaza New York, NY 10111 Tel.: (212) 589-4200 Attn: Michael A Sabella, Esq. Erica Barrow, Esq.</p>
Edward O’Donnell	<p>McLaughlin & Stern, LLP 260 Madison Avenue New York, NY 10016</p>

	Tel.: (212) 448-1100 Attn: Tracy A. Burnett, Esq. Daniel J. Horwitz, Esq.
Victor Bozzo	Gusrae Kaplan Nusbaum PLLC 120 Wall Street 25th Floor New York, NY 10005 Tel.: (212) 269-1400 Attn: Kari Parks, Esq.

In the event that Mr. O'Donnell's appeal from the Order is deemed an interlocutory appeal, he respectfully requests that this notice be deemed a motion for leave to file an interlocutory appeal, of that the court order the filing of such a motion within a reasonable time, pursuant to Rule 8004(d) of the Federal Rules of Bankruptcy Procedure.

Date: New York, New York
July 31, 2023

McLAUGHLIN & STERN, LLP

By: /s/ Tracy Burnett
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EXHIBIT A

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

In re:

PARETEUM CORPORATION, *et al.*,¹

Debtors.

ANTHONY M. SACCULLO, in his capacity as
the Liquidation Trustee for the TEUM
LIQUIDATING TRUST,

Plaintiff,

-against-

ROBERT H. TURNER, VICTOR BOZZO,
YVES VAN SANTE, EDWARD
O'DONNELL, DENIS MCCARTHY, and
ROBERT MUMBY,

Defendants.

Chapter 11

Case No. 22-10615 (LGB)

(Jointly Administered)

Adv. Proc. No. 22-01177 (LGB)

**ORDER DENYING (1) MOTION TO STAY THIS ACTION OR IN THE
ALTERNATIVE FOR AN INTERIM STAY EXTENDING THE
DEADLINE TO RESPOND TO THE COMPLAINT (ECF NO. 24) AND (2)
DEFENDANT EDWARD O'DONNELL'S MOTION TO STAY THIS ACTION OR IN
THE ALTERNATIVE FOR AN INTERIM STAY EXTENDING THE DEADLINE TO
RESPOND TO THE COMPLAINT (ECF NO. 27)**

THIS MATTER came before the Court for hearing on July 11, 2023 at 10:00 a.m., upon the Motions (the "Motions") (Docket Nos. 24 and 27) of Defendants Robert H. Turner, Edward O'Donnell, Denis McCarthy, Victor Bozzo, and Robert Mumby ("Movants") seeking an order

¹ The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Pareteum Corporation (7538); Pareteum North America Corp. (f/k/a Elephant Talk North America Corp.) (9623); Devicescape Holdings, Inc. (2909); iPass, Inc. (4598); iPass IP LLC (2550); Pareteum Europe B.V.; Artilium Group Ltd. (f/k/a Artilium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artilium N.V.). The Debtors' corporate headquarters is located at 1185 Avenue of the Americas, 2nd Floor, New York, NY 10036.

that, 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, granting an interim stay extending the deadline to respond to the Complaint, the Opposition thereto (Docket No. 33) filed by Plaintiff, Anthony M. Saccullo, in his capacity as the Liquidating Trustee for the TEUM Liquidating Trust, and the Joinder Letter filed by Defendant Victor Bozzo (Docket No. 30); and it appearing that the Court has jurisdiction to consider the Motions; and it appearing that no other or further notice need be provided; and upon the Motions, the Opposition, the Joinder Letter and all of the proceedings before the Court; and after due deliberation; and good and sufficient cause appearing therefor; it is hereby

ORDERED that

1. The Motions are **DENIED** without prejudice for reasons set forth on the record.
2. Movants shall have through and including October 10, 2023, to file an answer or otherwise respond to the Complaint.
3. A Pre-Trial Conference is scheduled to take place on October 31, 2023 at 10 a.m. on Zoom for Government.

Dated: July 17, 2023
New York, New York

/s/ Lisa G. Beckerman
Honorable Lisa G. Beckerman
U.S. Bankruptcy Judge