

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

In re:

PARETEUM CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10615 (LGB)

(Jointly Administered)

**STIPULATION WITHDRAWING OBJECTION BY THE LIQUIDATION TRUSTEE TO
THE CLAIMS OF ROBERT H. TURNER WITHOUT PREJUDICE**

Anthony M. Saccullo, in his capacity as the Liquidation Trustee for the TEUM Liquidating Trust (the “Trustee”) and Robert H. Turner (“Turner” and together with the Trustee, the “Parties”) by and through their respective counsel, enter into this Stipulation withdrawing the Trustee’s objection to the Claims asserted by Turner without prejudice (the “Stipulation”) and hereby stipulate and agree as follows:

WHEREAS, on May 15, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code [Docket No. 1]² (the “Chapter 11 Cases”);

WHEREAS, on July 11, 2022, the Court entered the Order Establishing Bar Dates for Filing Proofs of Claim and the Approving the Form and Manner of Notice Thereof [Docket No. 207] (the “Bar Date Order”), which established, inter alia, August 22, 2022 at 5:00 p.m. (ET) as

¹ The Debtors in these 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.; Artidium Group Ltd. (f/k/a Artidium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artidium N.V.) (collectively the “Debtors”) The mailing address of the Debtors, solely for the purposes of notices and communications, is c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

² All citations to the docket refer to the jointly administered Chapter 11 Cases, *In re Pareteum Corporation, et al.* Case No. 22-10615 (LGB).



the deadline for all persons and entities, other than governmental units, to file prepetition proofs of claim against the Debtors, including claims pursuant to section 503(b)(9) of the Bankruptcy Code. The Bar Date Order also established November 11, 2022 at 5:00 p.m. (ET) as the deadline for governmental units to file prepetition proofs of claim against the Debtors;

WHEREAS, on August 16, 2022, Turner filed a proof of claim identifying an unsecured claim of \$3,888,606.35. [Claim No. 81];

WHEREAS, on August 22, 2022, Turner filed a proof of claim for an unsecured, unliquidated claim relating to Turner's costs and expenses incurred in defense against certain litigations and actions. [Claim No. 129];

WHEREAS, on September 16, 2022, the Debtors filed an *Objection to Claims of Robert H. Turner [Claim Nos. 81 and 129]*. [Docket No. 337] (the "Turner Objection");

WHEREAS, on October 7, 2022, the Court entered an order confirming the Debtors' liquidating chapter 11 plan (the "Plan"). [Docket No. 374]. Pursuant to the Plan, the Trustee is responsible for claims reconciliation. (*See* Plan, Art. 5.4 and 6.5);

WHEREAS, on April 24, 2023, the Court entered an order extending the Claims Objection Deadline through and including October 16, 2023 without prejudice to the rights of the Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline. [Docket No. 490]; and

WHEREAS, contemporaneously with the filing of this Stipulation, the Trustee is filing a motion seeking entry of an order further extending the Claims Objection Deadline through and including April 16, 2024.

IT IS HEREBY STIPULATED, AGREED, AND ORDERED that:

1. The Turner Objection is hereby withdrawn without prejudice to the Trustee refiling objections to Claim Nos. 81 and 129 prior to the Claims Objection Deadline (including any extensions of the Claims Objection Deadline as ordered by the Court in these Chapter 11 Cases).
2. Turner hereby consents to extension of the Claims Objection Deadline through and including April 16, 2024.

Dated: New York, New York
September 22, 2023

COLE SCHOTZ P.C.

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