UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In Re:)
) Chapter 11
TELEXFREE, LLC,) Case No. 14-40987-MSH
TELEXFREE, INC.,) Case No. 14-40988-MSH
TELEXFREE FINANCIAL, INC.,) Case No. 14-40989-MSH
Reorganized Debtors.) Substantively Consolidated

JOINT MOTION TO CONTINUE HEARING ON OBJECTIONS TO **CERTAIN CLAIMS**

Stephen B. Darr, the duly appointed Liquidating Trustee (the "Liquidating Trustee") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Reorganized Debtors" or "TelexFree") and the claimants represented by Shapiro & Hender (the "Shapiro Claimants") respectfully request that the Court continue the hearing presently scheduled for November 4, 2022 at 10:00 a.m. with respect to the following objections to certain claims: (i) Second Omnibus Objection to Claims [docket 2226]; (ii) Third Omnibus Objection to Claims [docket 2227]; (iii) Sixth Omnibus Objection to Claims [docket 2899]; and (iv) Seventh Omnibus Objection to Claims [docket 2900].

Background

- 1. On July 8, 2020, the Court held a hearing on the First Amended Liquidating Plan of Reorganization (the "Plan") of Stephen Darr, the Chapter 11 Trustee (the "Chapter 11 <u>Trustee</u>") of TelexFree.
- 2. On July 9, 2020, the Court entered an order confirming the Plan (the "Plan Order", docket no. 3432).

