Docket #0149 Date Filed: 7/1/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In re Telexfree, LLC Debtor	Chapter 11 Case No. 14-40987-MSH
WALDEMARA MARTIN AND LEANDRO VALENTIM – putative claims representatives and those similarly situated, Plaintiff, v. TELEXFREE, INC., *et al*, Defendants.	Adversary Case No. 14-04044 MSH Judge Melvin S. Hoffman

STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT

WHEREAS, on May 5, 2014, plaintiffs filed a motion to withdraw the reference in this matter (the "Motion to Withdraw Reference"), which remains pending;

WHEREAS, on or about June 3, 2014, a summons was issued to Defendant ProPay, Inc. ("ProPay"), which provided that ProPay's deadline to respond to the plaintiff's complaint in this action is July 3, 2014;

WHEREAS, on June 27, 2014, ProPay filed a Motion for Extension of Time to Respond to Plaintiffs' Complaint (the "Motion");

WHEREAS, this Stipulation provides ProPay with an extension of time sufficient to resolve the Motion, and ProPay intends to withdraw the Motion shortly after the Court's entry of an Order consistent with this Stipulation;

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WHEREAS, ProPay expressly reserves all of its rights and defenses, including but not limited to all personal and subject matter jurisdictional defenses other than sufficiency of service of process;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys that ProPay's time to respond to the plaintiff's complaint herein shall be extended until ten (10) days following the Court's final ruling with respect to the Motion to Withdraw Reference.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts and a facsimile or scanned copy of same may be deemed an original.

Respectfully submitted this 1st of July, 2014.

Plaintiffs

/s/ Robert J. Bonsignore
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Defendant

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SO ORDERED:

_____

HON. MELVIN S. HOFFMAN
UNITED STATES BANKRUPTCY JUDGE
DISTRICT OF MASSACHUSETTS

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic mail notification to all parties to the adversary proceeding that have appeared before the court. Furthermore, I certify that on July 1, 2014, I have served all other parties to the adversary proceeding by placing this motion in the U.S. Mail, postage pre-paid, to the following addresses:

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Signature page follows.

This 1st day of July, 2014.

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