Docket #0161 Date Filed: 7/2/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:	CHAPTER 11
TELEXFREE, LLC,	CASE NO. 14-40987-MSH
Debtor.	
WALDEMARA MARTIN AND LEANDRO VALENTIM - Putative Claims Representatives And Those Similarly Situated,	ADVERSARY PROCEEDING
Plaintiffs,	NO. 14-04044-MSH
v.	
TELEXFREE, INC., et al.,	
Defendants.	

MOTION FOR ADMISSION *PRO HAC VICE* OF ANDREA L. MARCONI AS COUNSEL FOR GLOBAL PAYROLL GATEWAY, INC.

Pursuant to MLBR 9010-1(b), and upon the annexed Certificate and Affidavit of Good Standing of Andrea L. Marconi, attached hereto as Exhibit A, certifying that (i) she is a member of the Bar in good standing in every jurisdiction where she has been admitted to practice; (ii) there are no disciplinary proceedings pending against her as a member of the Bar of any jurisdiction; and (iii) she is familiar with the Massachusetts Local Bankruptcy Rules, I, Thomas S. Vangel, a member of the Bar of this Court and a partner at Murtha Cullina LLP, hereby move this Court to admit Andrea L. Marconi to practice before the Court for the purpose of this case as counsel for Global Payroll Gateway, Inc.

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Respectfully submitted,

/s/ Thomas S. Vangel
Thomas S. Vangel, Esq. BBO #552386
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, MA 02110
(617) 457-4000 Telephone
(617) 482-3868 Facsimile
tvangel@murthalaw.com

Dated: July 2, 2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:	CHAPTER 11
TELEXFREE, LLC,	CASE NO. 14-40987-MSH
Debtor.	
WALDEMARA MARTIN AND LEANDRO VALENTIM - Putative Claims Representatives And Those Similarly Situated,	
Plaintiffs,	ADVERSARY PROCEEDING NO. 14-04044-MSH
v.	
TELEXFREE, INC., et al.,	
Defendants.	

CERTIFICATE OF ADMISSION *PRO HAC VICE* AND AFFIDAVIT OF GOOD STANDING OF ANDREA L. MARCONI

I, Andrea L. Marconi, hereby depose on oath and say:

1. I certify that I am eligible for admission to this Court. I am a member of the Bar in good standing in every jurisdiction in which I am admitted to practice. I was admitted to the State Bar of Arizona on October 24, 2003, the United States District Court for the District of Arizona in 2003 and the United States Court of Appeals for the Ninth Circuit in 2004.

2. I am a Director at Fennemore Craig, P.C. in the firm's Business Litigation practice group and resident in the firm's Phoenix, Arizona office. I have a high level of experience representing clients in the financial services industry, including payment processing companies.

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

4. I am familiar with the Local Rules for the United States Bankruptcy Court for the District of Massachusetts.

Signed under the penalties of perjury this 1st day of July, 2014.

Andrea L. Marconi

Andrea L. Marconi

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:	CHAPTER 11
TELEXFREE, LLC,	CASE NO. 14-40987-MSH
Debtor.	
WALDEMARA MARTIN AND LEANDRO VALENTIM - Putative Class Representatives And Those Similarly Situated,	ADVERSARY PROCEEDING
Plaintiffs,	NO. 14-04044-MSH
v.	
TELEXFREE, INC., et. al.,	
Defendants.	

DECLARATION RE: ELECTRONIC FILING

PART I- DECLARATION

I Andrea L. Marconi, hereby declare under penalty of perjury that all of the information contained in the Motion for Admission Pro Hac Vice of Andrea L. Marconi as Counsel for Global Payroll Gateway, Inc. (the "Document"), filed electronically, is true and correct. I understand that this DECLARATION is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this DECLARATION may cause the Documents to be struck and any request contained or relying thereon to be denied, without further notice.

I further understand that, pursuant to the Massachusetts Electronic Filing Local Rule (MEFR) 7(b), all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Dated: July 1, 2014

Andrea L Marconi
(Affiant)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: TELEXFREE, LLC, Debtor.	CHAPTER 11 CASE NO. 14-40987-MSH
WALDEMARA MARTIN AND LEANDRO VALENTIM - Putative Claims Representatives And Those Similarly Situated, Plaintiffs, v. TELEXFREE, INC., et al., Defendants.	ADVERSARY PROCEEDING NO. 14-04044-MSH

CERTIFICATE OF SERVICE

I, Thomas S. Vangel, hereby certify that on July 2, 2014, I served a copy of the following (i) ***Motion for Admission Pro Hac Vice of Andrea L. Marconi as Counsel for Global Payroll Gateway, Inc.*** and (ii) ***Certificate of Admission Pro Hac Vice and Affidavit of Good Standing of Andrea L. Marconi*** electronically by CM/ECF system to the registered participants as identified on the Notice of Electronic Filing, and that copies will be sent via facsimile to those indicated as non-registered participants who have requested notice.

/s/ Thomas S. Vangel
Thomas S. Vangel, Esq. BBO #552386
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