Docket #0196 Date Filed: 7/23/2014

07/22/2014 ALLOWED. NO OBJECTIONS FILED.

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.	

DEFENDANT GLOBAL PAYROLL GATEWAY, INC.'S MOTION TO EXTEND TIME TO FILE AND SERVE ANSWER OR OTHER RESPONSIVE PLEADING

Defendant Global Payroll Gateway, Inc. ("Global") hereby requests an extension of time to file an answer or otherwise respond to the Plaintiffs' Complaint until 10 days after the Motion to Withdraw Reference is resolved, or until August 11, 2014, whichever comes later or, in the alternative, to July 25, 2014. In support of this Motion, Global hereby states as follows:

1. On May 3, 2014, Waldemara Martin and Leandro Valentim, Putative Claims Representatives and Those Similarly Situated (the "Plaintiffs"), filed the Complaint in this Adversary Proceeding and a Motion to Withdraw Reference seeking to refer this Adversary Proceeding to the District Court for the District of Massachusetts.
2. On June 3, 2014, a summons was issued to Global in this action.

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