Docket #0164 Date Filed: 7/3/2014

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.	:	

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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3. On June 27, 2014, Attorney Andrea Marconi, whose pro hac vice motion is currently pending, communicated with Robert Bonsignore, counsel for the Plaintiffs, to request an extension of time to answer or otherwise respond to the Plaintiffs' Complaint until July 25, 2014.
4. On June 27, 2014, Attorney Bonsignore agreed to the July 25, 2014 extension for Global to file an answer or otherwise respond to the Plaintiffs' Complaint.
5. On June 28, 2014, Attorney Marconi agreed to accept service of the Plaintiffs' Complaint on behalf of Global.
6. Global has subsequently learned that at least one other Defendant in this action has requested an extension of time through the date 10 days after the Motion to Withdraw Reference is resolved, or through August 11, 2014, whichever comes later, to file an answer or otherwise respond to the Plaintiffs' Complaint, which Attorney Bonsignore has agreed to.
7. Attempts have been made to contact Attorney Bonsignore requesting this further extension; however, Attorney Bonsignore has not been able to be reached.

WHEREFORE, Defendant Global Payroll Gateway, Inc. 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 is later or, alternatively, until July 25, 2014, the date already agreed to by counsel to the Plaintiffs.

Dated: July 3, 2014

/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

Andrea L. Marconi, Esq. AZ Bar #22577
(pro hac vice pending)
Fennemore Craig, P.C.
2394 East Camelback Road, Suite 600
Phoenix, AZ 85016
(602) 916-5424 Telephone
amarconi@fclaw.com

Attorneys for Defendant Global Payroll Gateway, Inc.

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	:	ADVERSARY PROCEEDING
Plaintiffs,	:	
	:	NO. 14-04044-MSH
v.	:	
TELEXFREE, INC., et. al.,	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I, Thomas S. Vangel, hereby certify that the ***Defendant Global Payroll Gateway, Inc.'s Motion to Extend Time to File and Serve Answer or Other Responsive Pleading*** has been filed through the CM/ECF system on July 3, 2014 and will be served electronically 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