Docket #0177 Date Filed: 7/11/2014

07/11/2014 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, LEANDRO VALENTIM - Putative Claims Representatives and Those Similarly Situated,	)	Adversary Proceeding No. 14-04044 MSH
Plaintiffs,	)	
v.	)	
TELEXFREE, INC., et al.	)	
Defendants.	)	

MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendants Gerald Nehra, Richard Waak and The Law Offices of Nehra & Waak ("Nehra & Waak Defendants"), hereby move for an extension of time in which to file a responsive pleading to Plaintiffs' Complaint ("Complaint") to a period ten (10) days following the Court's ruling on the pending Motion to Withdraw. On May 5, 2014, plaintiffs filed a motion to withdraw the reference to this Court, which motion remains pending. In a parallel adversary proceeding in this bankruptcy, *Cellucci v. Telexfree, Inc.*, Adv. Pro. No. 14-04057-MSH, on June 17, 2014 the plaintiffs and the Telexfree Defendants stipulated and agreed to an extension of time to answer until ten days after the Court ruled on the pending Motion to Withdraw in that case. A similar period to respond to the complaint in this case is warranted and

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