Docket #0209 Date Filed: 8/13/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:
TELEXFREE, LLC

Debtor.

Chapter 11
Case No. 14-40987 MSH

WALDEMARA MARTIN - Putative Claims Representatives And Those Similarly Situated,

Plaintiffs,

v.

Adversary Proceeding
No. 14-04044 MSH

TELEXFREE, INC, et al.

Defendants

REQUEST TO APPEAR TELEPHONICALLY AT AUGUST 28 2014 HEARING ON TRUSTEE'S MOTION TO STAY THE ACTION

Jonathan R. Doolittle, counsel for TD Bank, admitted *pro hac vice,* by this motion respectfully requests permission to appear telephonically at the hearing on Trustee's Motion to Stay The action scheduled for August 28, 2014 at 2:00 a.m. Jonathan Doolittle is counsel at the San Francisco, California offices of Reed Smith LLP.

Dated: August 13, 2014.

Respectfully submitted,

/s/ Nellie E. Hestin
Nellie E. Hestin
Reed Smith LLP
225 Fifth Avenue
Pittsburgh, PA 15222
(412) 288.3131 Telephone
(412) 288-3063 Facsimile

1440987160512000000000137

/s/ Jonathan R. Doolittle
Jonathan R. Doolittle
Reed Smith LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
(415) 659-5902 Telephone
(415) 891-8269 Facsimile