Docket #0143 Date Filed: 6/30/2014

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, LLC, et. al. Defendants.	Adversary Proceeding No. 14-04044 MSH

REQUEST FOR EMERGENCY DETERMINATION ON MOTION TO EXTEND TIME TO FILE AND SERVE ANSWER OR OTHER RESPONSE

Defendants Citizens Financial Group, Inc. and Citizens Bank of Massachusetts (now Citizens Bank N.A.) (collectively the "Citizens Defendants") hereby move to extend their time to file and serve their answer, or otherwise respond to the complaint in this action, until 10 days after resolution of the pending motion to withdraw the reference. Because of the short time before the Citizens Defendants' current deadline to respond to the complaint will expire, the Citizens Defendants further request that this Court enter an order on an emergency basis, extending the Citizens Defendants time until at least 7 days after this motion is fully resolved.

As grounds therefor, the Citizens Defendants state as follows:

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1. On May 5, 2014, Waldemara Martin and Leandro Valentim – Putative Claims Representatives and Those Similarly Situated ("Plaintiffs") filed a motion to withdraw the reference to the Bankruptcy Court, which motion remains pending.

2. In a parallel adversary proceeding in this bankruptcy, *Cellucci v. TelexFree, Inc.*, Adv. Pro. No. 14-04057-MSH, the Plaintiffs and several of the defendants, including the Citizens Defendants, have stipulated and agreed to extensions of time to respond to the complaint until ten days after the Court rules on the pending motion to withdraw the reference in that case.

3. A similar period to respond to the complaint in this case is warranted and will facilitate the orderly administration of the pending adversary proceedings.

4. Alias summonses were issued to the Citizens Defendants on June 3, 2014. (Dkt. Nos. 101-102). Based on this, the Citizens Defendants' deadline to answer or otherwise respond to the complaint is believed to be July 3, 2014.

For these reasons, the Citizens Defendants respectfully request that the Court enter an order extending their time to file and serve their answer, or otherwise respond to the complaint in this action, until 10 days after resolution of the pending motion to withdraw the reference. The Citizens Defendants further request that the Court enter an order on an emergency basis, extending the Citizens Defendants time to file and serve their answer, or otherwise respond to the complaint until at least 7 days after this motion is fully resolved.

Dated: June 30, 2014

Respectfully submitted

/s/ Jason C. Weida

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Attorneys for Defendants Citizens Financial Group, Inc. and Citizens Bank of Massachusetts (now Citizens Bank N.A.)

CERTIFICATION PURSUANT TO RULE 9013-1(G)(1)(C)

The undersigned counsel hereby certifies that counsel for the Citizens Defendants has informed counsel for Plaintiffs that they are seeking the relief sought by this motion by telephone and email.

/s/ Jason C. Weida
Jason C. Weida

CERTIFICATE OF SERVICE

I, Jason C. Weida, hereby certify that, on June 30, 2014, the foregoing motion was served on the following parties, in the manner described below:

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