Docket #0135 Date Filed: 6/23/2014

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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will facilitate the orderly administration of the pending adversary proceedings, which also appear to be governed by the provisions of the Private Securities Litigation Reform Act of 1995 ("PSLRA").

WHEREFORE, good cause exists to extend the time period for the Nehra & Waak Defendants to respond to the complaint until ten (10) days following the Court's ruling on the pending Motion to Withdraw.

GERALD P. NEHRA; RICHARD W. WAAK; LAW OFFICES OF NEHRA AND WAAK,

By their attorneys,

/s/ Christopher F. Robertson
Christopher F. Robertson (BBO # 642094)

/s/ William J. Hanlon
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Dated: June 23, 2014

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v.	)	
TELEXFREE, INC., et al.	)	
Defendants.	)	

CERTIFICATE OF SERVICE

I, William J. Hanlon and Christopher Robertson, hereby certify that on June 23, 2014, that our Notice of Appearance and Request for Notices and Pleadings and Motion for Extension of Time to Respond to the Complaint were served upon all interested parties in the manner indicated on the attached Schedule A.

GERALD P. NEHRA; RICHARD W. WAAK; LAW OFFICES OF NEHRA AND WAAK,

By their attorneys,

/s/ Christopher F. Robertson
Christopher F. Robertson (BBO # 642094)

/s/ William J. Hanlon
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Dated: June 23, 2014

Schedule A

VIA ECF

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