Docket #0138 Date Filed: 6/25/2014

UNITED STATES BANKRUPTCY
DISTRICT OF MASSACHUSETTS

IN RE TELEXFREE, LLC Debtor,	)	Chapter 11 Case No. 14-40987 MSH
WALDEMARA MARTIN, LEANDRO VALENTIM – Putative Claims Representatives and Those Similarly Situated, Plaintiffs, v. TELEXFREE, INC., et al. Defendants.	)	Adversary Proceeding No. 14-04044 MSH

MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendant, Middlesex Savings Bank ("MSB"), hereby moves for an extension of time in which to file a responsive pleading to Plaintiffs' Complaint ("Complaint") to a period of 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 will facilitate the orderly administration of the pending adversary proceedings.

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

MIDDLESEX SAVINGS BANK
By its attorneys,

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Dated: June 25, 2014

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IN RE TELEXFREE, LLC Debtor,	)	Chapter 11 Case No. 14-40987 MSH
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CERTIFICATE OF SERVICE

The undersigned hereby certify that on June 25, 2014, our Notice of Appearance and Motion for Extension of Time to Respond to the Complaint were served upon all parties in the manner indicated on the attached Schedule A.

MIDDLESEX SAVINGS BANK
By its attorneys,

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Schedule A

VIA ECF

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