Docket #0140 Date Filed: 6/26/2014

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

EMERGENCY MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendant, Middlesex Savings Bank ("MSB"), hereby moves, on an emergency basis, 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

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the complaint in this case is warranted and will facilitate the orderly administration of the pending adversary proceedings.

On June 25, 2014, MSB filed a Motion for Extension of Time to Respond to the Complaint. Prior to and since the filing of that Motion, counsel for MSB has made several efforts to reach counsel for the Plaintiffs to discuss a stipulation for extension of time. Plaintiffs' counsel has not responded to any voicemails or email from counsel to MSB, despite stipulating to an extension of time for another defendant. Given the very short timeframe MSB now has to file its response to Plaintiffs' Complaint, MSB respectfully requests that this Court act on this Motion on an emergency basis.

WHEREFORE, good cause exists, on an emergency basis, 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 26, 2014