Docket #0006 Date Filed: 5/2/2016

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:	Chapter 11 Cases
TELEXFREE, LLC TELEXFREE, INC. TELEXFREE FINANCIAL, INC., Debtors,	14-40987-MSH 14-40988-MSH 14-40989-MSH Jointly Administered
STEPHEN DARR, AS HE IS TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS Plaintiff, v. GERALD P. NEHRA, NEHRA & WAAK Defendant	Adversary Proceeding No. 16-04025

ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT

Gerald P. Nehra and Nehra & Waak, (together, "Defendant") in the above referenced case, respectfully requests that this Honorable Court extend by thirty days (30) days the time to respond to the Complaint (the "Complaint") filed by Stephen Darr, as he is Trustee of the Chapter 11 Estates of Each of the Debtors ("Plaintiff" or "Trustee"). In support thereof, the Defendant states as follows:

1. On April 1, 2016, the Trustee filed the above-captioned adversary proceeding. Defendant's response is due May 2, 2106.

2. Defendant requires additional time to respond to the complaint, particularly due to Defendant's anticipated participation in criminal proceedings related to the case.

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3. Plaintiff assents to this motion.

WHEREFORE, the Debtor prays that this Court:

1. Extend the deadline for filing an Answer to the Complaint through and including June 1, 2016, and

2. Grant such other relief as is just and proper.

GERALD P. NEHRA
AND LAW OFFICES OF
NEHRA AND WAAK

By their attorneys,

/s/ *William J. Hanlon*

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May 2, 2016