Docket #0198 Date Filed: 7/17/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re TELEXFREE, LLC, Debtor	Chapter 11 Case Nos. 14-40987-MSH, 14-40988-MSH, 14-40989-MSH (Jointly Administered)
ANTHONY CELLUCCI, JAMILLY LAKE and GERIVALDO PACHECO — PUTATIVE CLASS REPRESENTATIVES AND THOSE SIMILARLY SITUATED, Plaintiffs, v. TELEXFREE, INC., et al., Defendants.	Adversary Proceeding 4:14-cv-04057-MSH

ASSENTED-TO MOTION TO ENLARGE TIME TO RESPOND TO COMPLAINT

Defendants Bank of America Corporation and Bank of America, N.A. ("Bank of America") hereby file this Assented-to Motion to Enlarge Time to Respond to Complaint. In support thereof, Bank of America states as follows:

l. The Complaint herein was filed on May 15, 2014, and served on Bank of America, through its agent for service of process, on July 1, 2014. Bank of America's response to the Complaint is currently due on July 21, 2014.

2. On the same day Plaintiffs filed their Complaint, Plaintiffs also filed a motion to withdraw the reference of this action (the "Withdrawal Motion"), in order to have the District Court for the District of Massachusetts adjudicate their claims.

3. The deadline for the Chapter 11 Trustee to respond to the Withdrawal Motion has been extended to August 11, 2014.

4. Accordingly, Bank of America requests that this Court extend the date by which Bank of America must answer or otherwise respond to the Complaint until 10 days after the later of: (i) August 11, or (ii) the date the District Court issues a decision on Plaintiffs' Withdrawal Motion.

5. Plaintiffs assent to this Motion.

6. This Motion is made in good faith and not for the purpose of delay.

Wherefore, Bank of America respectfully requests that the Court grant its requested enlargement of time to respond to the Complaint.

Respectfully submitted,

/s/ Carol E. Head

Carol E. Head (BBO #652170)
Carol.head@bingham.com
S. Elaine McChesney (BBO #329090)
elaine.mcchesney@bingham.com
BINGHAM MCCUTCHEN LLP
One Federal Street
Boston, MA 02110
(617) 951-8000

Counsel for Defendants Bank of America Corporation and Bank of America, N.A.

Dated: July 17, 2014

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2014, this document (filed through the ECF system) will be sent electronically to all parties who have appeared before the Court by operation of the Court's ECF system.

/s/ Carol E. Head
Carol E. Head