Docket #0252 Date Filed: 8/12/2014

US BANKRUPTCY COURT

2014 AUG 12 PM 2 5[illegible]UNITED STATES BANKRUPTCY COURT

DISTRICT OF MASSACHUSETTS

Case No. 4:14-BK-40987
Chapter 11

In re: TELEXFREE, LLC

Motion to Dismiss or in the Alternative to Stay

I am requesting that the Court dismiss the complaint against me for the same reasons stated in the Motion to Dismiss filed in the SEC action pending against me in the District of Massachusetts. I incorporate all arguments in that brief here by reference.

In the alternative, I request that the Court stay this case until the SEC action is resolved. I have been denied the opportunity to have an attorney defend me in this case because I cannot afford one as the SEC has frozen my assets. Also, resolution of the SEC action may dispose of some or all of the issues in this bankruptcy complaint. I feel it is unfair to litigate this case against me while the SEC case is still in progress, and I do not have access to any funds that I could use to defend myself.

Respectfully submitted,

Randy Crosby

Certificate of Service

I certify that on August 11, 2014, I served a copy of this document to counsel for the plaintiff by first-class mail.

