Docket #0253 Date Filed: 8/13/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:
TELEXFREE, LLC
Debtor.

Chapter 11
Case No. 14-40987 MSH

ANTHONY CELLUCCI, JAMILLY LAKE AND GERIVALDO PACHECO - Putative Claims Representatives And Those Similarly Situated,
Plaintiffs,

Adversary Proceeding
No. 14-04057 MSH

v.

TELEXFREE, INC., et al.
Defendants.

STIPULATION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

WHEREAS, the plaintiffs have served the defendant, Middlesex Savings Bank ("Middlesex Savings") in the above-captioned action;

WHEREAS, Middlesex Savings' deadline to file a responsive pleading is currently the date 10 days after the Motion to Withdraw Reference is resolved, or August 11, 2014, whichever comes later;

WHEREAS, there is now pending a Motion to Transfer ("Transfer Motion") the above-referenced proceeding filed with the United States Judicial Panel on Multidistrict Litigation ("JPMDL"), docketed at MDL No. 2566;

WHEREAS, plaintiffs agree to further extend the time for the defendant, Middlesex Savings Bank ("Middlesex Savings") to file responsive pleadings; and

WHEREAS, the parties to this stipulation enter into this stipulation to confirm the agreement reached by the undersigned parties as it relates to extending the time to file and serve an answer or other responsive pleading.

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WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for Plaintiffs and Defendant Middlesex Savings Bank that the time to respond to the Complaint herein shall be extended through the date 30 days after the filing of an amended consolidated complaint by the court-appointed lead plaintiff(s), unless otherwise ordered by the Court; and

IT IS FURTHER STIPULATED AND AGREED that if the Transfer Motion is denied, the time to respond to the Complaint herein shall be extended through the date 30 days after the entry of the order denying the Transfer Motion, unless otherwise ordered by the Court.

PLAINTIFFS,

By their attorney,

/s/ Ronald A. Dardeno
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MIDDLESEX SAVINGS BANK,

By its attorneys,

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Dated: August 13, 2014