Docket #0254 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.

JOINT MOTION TO APPROVE STIPULATION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

Plaintiffs and Defendant, Middlesex Savings Bank ("Middlesex Savings") (collectively the "Parties") hereby jointly move the Court (the "Motion") for an order approving the Stipulation to Extend Time to File Responsive Pleading (the "Stipulation") filed herewith, which, by agreement, extends Middlesex Savings' deadline to file and serve its responsive pleading to 30 days after the filing of an amended consolidated complaint or 30 days after the entry of the order denying the Motion to Transfer, unless otherwise ordered by the Court. Given that this case is subject to a Motion to Transfer ("Transfer Motion") filed with the United States Judicial Panel on Multidistrict Litigation ("JPMDL"), docketed at MDL No. 2566, which motion seeks an order transferring this case and five other similar class action cases to the JPMDL the Parties believe it is practical to extend Middlesex Savings' deadline to respond to the Complaint.

Given the preliminary state of this action, the Transfer Motion, and the number of similar class action complaints which have been filed, granting the requested extension is warranted in this proceeding.

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WHEREFORE, the Parties respectfully request that the Court enter an order approving the Stipulation, and granting such other relief the Court deems proper and just.

PLAINTIFFS,

By their attorney,

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MIDDLESEX SAVINGS BANK,

By its attorneys,

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Dated: August 13, 2014

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Defendants.

CERTIFICATE OF SERVICE

I, Kendra L. Berardi, hereby certify that on August 11, 2014, I caused a copy of the *Joint Motion to Approve Stipulation for Extension of Time to File Responsive Pleading* and the *Stipulation to Extend Time to File Responsive Pleading*, to be served by operation of the Court's CM/ECF system or first-class mail upon the following parties:

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