

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

TELEXFREE, LLC,

Debtor.

Chapter 11
Case No. 14-40987-MSH

ANTHONY CELLUCCI, *et al.*, PUTATIVE CLAIMS
REPRESENTATIVES AND THOSE SIMILARLY
SITUATED,

Plaintiffs,

v.

TELEXFREE, INC., *et al.*

Defendants.

Adversary Proceeding
No. 14-ap-04057 MSH

**ASSENTED-TO MOTION TO APPROVE STIPULATION TO IMPOSE TEMPORARY
STAY**

Plaintiffs hereby move for an order approving the Stipulation to Impose
Temporary Stay (the “Stipulation”), filed herewith.

Counsel for Stephen Darr, Chapter 11 Trustee of the Debtors’ Estates, has
assented to the relief sought in this motion.

WHEREFORE, Plaintiffs hereby respectfully request that the Court enter an order
approving the Stipulation.



Dated: August 19, 2014

Respectfully submitted,

/s/ Ronald A. Dardeno

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*Attorneys for Plaintiffs Anthony Cellucci,
Jamilly Lake and Gerivaldo Pacheco, Putative
Claims Representatives and Those Similarly
Situated*

SO ORDERED:

Dated: August ____, 2014

Hon. Melvin S. Hoffman
U.S. Bankruptcy Judge

CERTIFICATE OF SERVICE

I, Ronald A. Dardeno, hereby certify that, on August 19, 2014, a copy of the foregoing document was served upon Parties appearing before this Court via the Court's electronic notification system, and by all other Parties via First Class mail.

Dated: August 19, 2014

/s/ Ronald A. Dardeno
Ronald A. Dardeno, Esq.