Docket #0009 Date Filed: 6/3/2016

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In re: **TELEXFREE, LLC,** **TELEXFREE, INC. and** **TELEXFREE FINANCIAL, INC.,** **Debtors.**	**Chapter 11 Cases** **14-40987-MSH** **14-40988-MSH** **14-40989-MSH** **Jointly Administered**
STEPHEN DARR, AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS, **Plaintiff,** **v.** **CRAFT FINANCIAL SOLUTIONS, LLC, CRAFT TRUST FINANCIAL, LLC, a/k/a CRAFT TRUST SERVICES, LLC, JOSEPH CRAFT,** **Defendants.**	**Adversary Proceeding** **No. 16-04035**

ASSENTED-TO MOTION FOR SECOND EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendants Craft Financial Solutions, LLC, Craft Trust Financial, LLC, a/k/a Craft Trust Services, LLC, and Joseph Craft (collectively, "**Craft**"), by and through counsel, hereby move the Court to grant a thirty (30) day extension to file any pleadings response to the complaint, to July 6, 2016. Craft has discussed this motion with counsel for the Plaintiff, and Plaintiff assents to the extension of time. In support of its motion, Craft states as follows:

1. Plaintiff filed the complaint in this action on April 4, 2016;

2. Craft sought, and the Court granted, an extension of time to file any pleadings responsive to the complaint to June 6, 2016, see Docket Nos. 3 & 4;

3. Craft would like additional time to investigate the claims brought in the complaint;

1440987160608000000000040

4. An additional thirty-day extension would not unduly prejudice the parties.

WHEREFORE, Craft prays that this Court grant this assented to request for an extension to file any responsive pleading until July 6, 2016, and any other relief it deems proper.

Respectfully submitted,

/s/ Jonathan C. Crafts
Thomas E. Dwyer, Jr. (BBO No. 139660)
Jonathan C. Crafts (BBO No. 677887)
Dwyer LLC
10 Derne Street
Boston, Massachusetts 02114
Tel: (617) 227-6000
Fax: (617) 723-6892
jcrafts@dwyer-llc.com

Attorneys for Defendants Craft Financial Solutions, LLC, Craft Trust Financial, LLC, a/k/a Craft Trust Services, LLC, and Joseph Craft

Dated: June 3, 2016

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of June, 2016, the foregoing Assented-To Motion for Extension of Time was served via ECF and via electronic mail upon counsel for the Plaintiff, as listed below:

Charles R. Bennett, Jr.
Murphy & King, P.C.
One Beacon Street
Boston, MA 02108
cbennett@murphyking.com

Andrew G. Lizotte
Murphy & King, P.C.
One Beacon Street
Boston, MA 02108
alizotte@murphyking.com

/s/ Jonathan C. Crafts
Jonathan C. Crafts

Dated: June 3, 2016