Docket #0052 Date Filed: 9/16/2019

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

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. UNITED STATES OF AMERICA, DEPARTMENT OF THE TREASURY, INTERNAL REVENUE SERVICE, Defendant.	Adversary Proceeding No. 18-4091

JOINT MOTION TO EXTEND TIME FOR FILING
JOINT PRETRIAL STATEMENT

The Plaintiff, Stephen Darr, as he is the duly appointed and acting Chapter 11 Trustee of the Estates of TelexFree, LLC and the related Debtors ("Trustee"), and the Defendant, United States of America, Department of the Treasury, Internal Revenue Service ("United States") hereby jointly move for an order amending the Pretrial Order extending the time in which the Parties must file a Joint Pretrial Statement from September 20, 2019 to October 21, 2019. In support, the Parties state that while they have been working diligently in good faith to fully address all of the provisions of the Joint Pretrial Statement, additional time is needed in order to finalize the Parties' submission.

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WHEREFORE, the Parties respectfully pray that the motion be allowed and that the Pretrial Order be amended so as to extend the time for filing a Joint Pretrial Statement to October 21, 2019.

Respectfully submitted,

STEVEN DARR, AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF TELEXFREE, LLC, ET AL.
By his attorneys,

/s/ Charles R. Bennett, Jr.

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UNITED STATES OF AMERICA,
DEPARTMENT OF THE TREASURY,
INTERNAL REVENUE SERVICE
By its attorneys,

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/s/ Lauren E. Hume

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CERTIFICATE OF SERVICE

I, Charles R. Bennett, Jr., hereby certify that on September 16, 2019, I caused a copy of the foregoing *Joint Motion To Extend Time For Filing Joint Pretrial Statement* to be served electronically through the Court' s ECF System to the registered participants as identified on the Notice of Electronic Filing.

/s/ Charles R. Bennett, Jr.
Charles R. Bennett, Jr.

Dated: September 16, 2019