Docket #0056 Date Filed: 10/7/2019

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 and, Counterclaim Defendant, v. UNITED STATES OF AMERICA, DEPARTMENT OF THE TREASURY, INTERNAL REVENUE SERVICE, Defendant and Counterclaim Plaintiff.	Adversary Proceeding No. 18-04091

ASSENTED TO MOTION BY TRUSTEE TO EXTEND TIME TO RESPOND TO UNITED STATES' SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT

The Plaintiff Stephen Darr, as he is the Trustee (the "Trustee") of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc. and TelexFree Financial, Inc., with the assent of the Defendant United States of America (the "United States"), moves that the Court grant a one week extension of time for the Trustee to respond to the *United States' Second Motion for Partial Summary Judgment* (the "Motion).

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1. Discovery has concluded in this matter in accordance with the *Order to Approve Joint Motion to Modify Scheduling Order* entered on March 28, 2019.

2. On September 20, 2019, the United States filed the Motion.

3. Pursuant to District of Massachusetts Local Rule 56-1, incorporated by Massachusetts Local Bankruptcy Rule 7056-1, the Trustee has twenty-one (21) days from the filing of the Motion, or October 11, 2019, in which to file a response to the Motion.

4. The Trustee requests, and the United States has assented, to a one-week extension of this deadline, through October 18, 2019.

5. No prejudice will result from the requested extension.

WHEREFORE, the Trustee respectfully request that the Court approve the extension of time for him to respond to the Motion through October 18, 2019 and grant such other relief as the Court deems just and proper in the circumstances.

Respectfully submitted,

STEPHEN B. DARR, AS HE IS TRUSTEE
OF THE CHAPTER 11 ESTATES OF
TELEXFREE, LLC, TELEXFREE, INC. AND
TELEXFREE FINANCIAL, INC.
By his attorneys,

/s/ Andrew G. Lizotte

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Dated: October 7, 2019

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