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*Proposed Counsel for the Debtors
 and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF NEVADA**

In re:

Case No.: BK-S-14-12524-abl
 Chapter 11

TELEXFREE, LLC,

[PROPOSED]

Jointly Administered with:

☐ Affects this Debtor

14-12525-abl TelexFree, Inc.
 14-12526-abl TelexFree Financial, Inc

☒ Affects all Debtors

☐ Affects TELEXFREE, INC.

Date: OST PENDING
 Time: OST PENDING

☐ Affects TELEXFREE FINANCIAL, INC

**MOTION FOR EXTENSION OF TIME TO FILE
 SCHEDULES AND STATEMENTS**

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”)¹ hereby submit this motion (the “**Motion**”) requesting the Court enter an order, substantially in the form attached hereto as **Exhibit 1**, granting Debtors an extension of time to file their schedules and statements (collectively, the “**Schedules**”) up to and including ***June 16, 2014***.

1. Prior to the filing of this Motion, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the Bankruptcy

¹ The Debtors in these Chapter 11 Cases, along with the last four (4) digits of each Debtor’s federal tax identification number, are: TelexFree, LLC (0853), TelexFree, Inc. (1309) and Telexfree Financial, Inc (7555). The Debtors’ business address is 225 Cedar Hill Street, Suite 200, Marlborough, Massachusetts 01752.



1 Code), on April 13, 2014 (the “**Petition Date**”). In conjunction with the petitions, the Debtor
2 also filed a list of their creditors and their addresses.

3 2. Pursuant to Fed. R. Bankr. P. 1007(c), the Debtors are allowed 14 days from the
4 Petition Date within which to file their Schedules, which deadline is currently scheduled for
5 *April 28, 2014*.

6 3. On the Petition Date, the Debtors uploaded partial creditor lists consisting of all
7 known creditors with the exception of the complete list of Promoters, believed to exceed 700,000
8 parties.

9 4. On April 15, 2014, certain federal government search warrants were executed on
10 TelexFree Inc.’s Massachusetts office resulting in the Debtors’ inability to currently access their
11 complete records for the purposes of completing the Schedules.

12 5. Once the Debtors’ records are returned, the analysis and compilation of the
13 information for the Schedules will take some time given the size of the Debtors’ operations, the
14 urgency of other demands upon the Debtors created by the filing of the petitions, the need to
15 maintain continuity in the Debtors’ businesses, and the limited number of staff to perform and/or
16 oversee all of the above.

17 6. Additionally, the Debtors are currently spending significant time addressing (1) the
18 Administrative Complaint No. E-2014-0004 filed by the Office of the Secretary of the
19 Commonwealth Securities Division on April 15, 2014 and pending in Boston Massachusetts (the
20 “Mass. SEC Action”) and (2) the civil complaint filed by the Securities and Exchange
21 Commission, Case No. 1:14-cv-11858-DJC pending before the United States District Court for
22 the District of Massachusetts (the “SEC Action,” and together with the Mass. SEC Action, the
23 “Actions”).

24 7. Accordingly, it will not be possible to complete the Schedules within the 14 days
25 allowed under Fed. R. Bankr. P. 1007(c).

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1 WHEREFORE, pursuant to Fed. R. Bankr. P. 1007(c), the Debtors request this Court
2 enter an order, substantially in the form attached hereto as **Exhibit 1**, granting them an extension
3 of time within which to file their Schedules through and including **June 16, 2014, without**
4 **prejudice to the Debtors' ability to request further extension if necessary**, and granting such
5 other and further relief as the Court deems just and proper. A copy of this Motion has been
6 contemporaneously transmitted to the Office of the United States Trustee.

7 DATED this 2 / 4 day of April, 2014.

8 GORDON SILVER

9 By: 

10 GREGORY E. GARMAN, ESQ.

11 THOMAS H. FELL, ESQ.

12 TERESA M. PILATOWICZ, ESQ.

13 3960 Howard Hughes Pkwy., 9th Floor
14 Las Vegas, Nevada 89169

15 AND

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17 MARIA J. DICONZA (*pro hac vice pending*)

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22 *Proposed Counsel for the Debtors*
23 *and Debtors in Possession*

EXHIBIT 1

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14-12525-abl TelexFree, Inc.

14-12526-abl TelexFree Financial, Inc

☐ Affects TELEXFREE, INC.

☐ Affects TELEXFREE FINANCIAL, INC

Date:
 Time:

**ORDER EXTENDING THE TIME FOR THE DEBTORS
 TO FILE THEIR SCHEDULES AND STATEMENTS**

Upon the motion (the “**Motion**”) filed by the above-captioned debtors and debtors-in-
 possession (collectively, the “**Debtors**”) seeking entry of an order granting Debtors an extension
 of time to file its schedules and statements up to and including May 31, 2014, the Court, having

1 reviewed the Motion and having heard the statements of counsel in support of the relief
2 requested in the Motion at the hearing before the Court (the "**Hearing**"), finds that the Court has
3 jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, this is a core matter pursuant
4 to 28 U.S.C. § 157(b)(2), notice of the Motion and the Hearing were sufficient under the
5 circumstances and that no further notice need be given, and the legal and factual bases set forth
6 in the Motion and at the Hearing establish just cause for the relief granted herein,

7 THEREFORE, IT IS HEREBY ORDERED THAT:

8 1. The Motion is GRANTED.

9 2. The deadline for the Debtors to file their Schedules is extended to ***June 16, 2014***.

10 PREPARED AND SUBMITTED:

11 GORDON SILVER

12 By: _____

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