

E-Filed: April 23, 2014

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 District of Nevada
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Attorneys for the United States.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	Case No.: BK-S-14-12524-abl
)	
TELEXFREE, LLC,)	Chapter 11
)	
<input type="checkbox"/> Affects this Debtor)	
)	[PROPOSED]
<input checked="" type="checkbox"/> Affects all Debtors)	Jointly Administered with:
)	
<input type="checkbox"/> Affects TELEXFREE, INC.)	14-12525-abl TelexFree, Inc.
)	14-12526-abl TelexFree Financial, Inc
<input type="checkbox"/> Affects TELEXFREE FINANCIAL, INC)	
)	

**MOTION TO ADMIT GOVERNMENT ATTORNEYS TO PRACTICE IN THE
 BANKRUPTCY COURT DISTRICT OF NEVADA FOR DURATION OF ATTORNEYS'
GOVERNMENT EMPLOYMENT
 (No Hearing Required)**

Pursuant to LR IA 10-3, the United States of America respectfully requests that this honorable Court admit Government attorneys Frank Huntington, Deena Bernstein and Sandra W. Lavigna to practice in the Bankruptcy Court District of Nevada for the above-captioned case and in all matters in this district during the period of their employment by the United States. Rule IA 10-3, which applies to all actions and proceedings in the District of Nevada, including bankruptcy proceedings (see Local Rule IA 2-1), provides:



Unless otherwise ordered by the Court, any nonresident attorney who is a member in good standing of the highest court of any state, commonwealth, territory, or the District of Columbia, who is employed by the United States as an attorney and, while being so employed, has occasion to appear in this Court on behalf of the United States, shall, upon motion of the United States Attorney or the Federal Public Defender for this district or one of the assistants, be permitted to practice before this court during the period of such employment.

Mr. Huntington, Ms. Bernstein and Ms. Lavigna are attorneys with the United States Securities and Exchange Commission, an agency of the federal government, and are members in good standing of either the state bar of the State of Massachusetts (Mr. Huntington: bar number 544045; and Ms. Bernstein: bar number 55872) or of the State of California (Ms. Lavigna: bar number 117965).

The following contact information is provided to the Court:

Frank C. Huntington
Trial Attorney
U.S. Securities and Exchange Commission
Boston Regional Office
33 Arch Street, 23rd Floor
Boston, MA 02110-1424
Telephone: (617) 573-8900
Facsimile: (617) 573-4590
E-mail: huntingtonf@sec.gov

Deena R. Bernstein
Trial Attorney
U.S. Securities and Exchange Commission
Boston Regional Office
33 Arch Street, 23rd Floor
Boston, MA 02110-1424
Telephone: (617) 573-8900
Facsimile: (617) 573-4590
E-mail: bernsteind@sec.gov

Sandra W. Lavigna
Senior Bankruptcy Counsel
United States Securities and Exchange Commission
Los Angeles Regional Office
5670 Wilshire Boulevard, 11th Floor
Los Angeles, California 90036-9788
Telephone: (323) 965-3998
Facsimile: (323) 965-4530
E-mail: lavignas@sec.gov

Accordingly, the United States respectfully requests that the Court admit Frank Huntington, Deena R. Bernstein and Sandra W. Lavigna to practice in the Bankruptcy Court District of Nevada for the duration of employment by the United States.

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1 Respectfully submitted this 23rd day of April 2014.

2 DANIEL G. BOGDEN
3 United States Attorney

4 /s/ Roger W. Wenthe
5 ROGER W. WENTHE
6 Assistant United States Attorney

7 **PROOF OF SERVICE**

8 I, certify the following individuals were served with a copy of the **MOTION TO ADMIT**
9 **GOVERNMENT ATTORNEY TO PRACTICE IN THE BANKRUPTCY COURT DISTRICT**
10 **OF NEVADA FOR DURATION OF ATTORNEY'S GOVERNMENT EMPLOYMENT** on the
11 date and via the method of service identified below:

12 **Service By Electronic Case Filing:**

13 I served the above-named document by electronic filing via the U.S. Bankruptcy Court CM/ECF
14 filing system to all those persons listed on the U.S. Bankruptcy Court ECF Confirmation Sheet.

15 Dated this 23rd day of April 2014.

16 /s/ Roger W. Wenthe
17 ROGER W. WENTHE
18 Assistant United States Attorney
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:) Case No.: BK-S-14-12524-abl
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TELEXFREE, LLC,) Chapter 11
)
☐ Affects this Debtor) **[PROPOSED]**
) **Jointly Administered with:**
☒ Affects all Debtors)
) 14-12525-abl TelexFree, Inc.
17 ☐ Affects TELEXFREE, INC.) 14-12526-abl TelexFree Financial, Inc
)
18 ☐ Affects TELEXFREE FINANCIAL, INC.)
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ORDER GRANTING MOTION TO ADMIT GOVERNMENT ATTORNEY

This matter comes before the Court pursuant to LR IA 10-3, and the United States' Motion to Admit Government Attorneys to Practice in the Bankruptcy Court District of Nevada for Duration of Attorneys' Government Employment, which seeks an order allowing Frank C. Huntington, Deena R. Bernstein and Sandra W. Lavigna to appear before this Court representing the United States Securities and Exchange Commission in all matters in this Court.

Frank C. Huntington, Deena R. Bernstein and Sandra W. Lavigna are attorneys with the United States Securities and Exchange Commission. Mr. Huntington's Massachusetts State Bar

1 Number is 544045 and Ms. Bernstein's Massachusetts State Bar Number is 55872, and they are
2 members in good standing of the highest court in their state. Ms. Lavigna's California State Bar
3 Number is 117965, and she is a member in good standing of the highest court of her state.

4 It is therefore ORDERED that Frank C. Huntington, Deena R. Bernstein and Sandra W.
5 Lavigna be admitted to appear before the Court for the purpose indicated in the Motion to Admit
6 Government Attorney to Practice in the Bankruptcy Court District of Nevada for Duration of
7 Attorneys Government Employment.

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11 Submitted by:

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Roger W. Wenthe

15 ROGER W. WENTHE
16 Assistant United States Attorney
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DANIEL G. BOGDEN
United States Attorney
District of Nevada

BLAINE T. WELSH
Assistant United States Attorney
333 Las Vegas Boulevard South, Suite 5000
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Telephone: 702-388-6336
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Attorneys for the United States.

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

In re:

TELEXFREE, LLC,

☐ Affects this Debtor

☒ Affects all Debtors

☐ Affects TELEXFREE, INC.

☐ Affects TELEXFREE FINANCIAL, INC

) Case No.: BK-S-14-12524-abl

) Chapter 11

) **[PROPOSED]**

) **Jointly Administered with:**

) 14-12525-abl TelexFree, Inc.

) 14-12526-abl TelexFree Financial, Inc

) Application of Deena R. Bernstein
) *pro hac vice*

) **No hearing required**

DECLARATION OF Deena R. Bernstein

I, Deena R. Bernstein, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney with the U.S. Securities & Exchange Commission
("Commission"), an agency of the federal government. In this capacity, I am assigned to

1 represent the United States in these bankruptcy proceedings for the purpose of representing the
2 Commission's interests. The Commission has an outstanding government enforcement action
3 against the debtors in the District of Massachusetts, *SEC v. TelexFree, Inc. et al.*, 1:14 CV 11858.
4

5 2. I am a member in good standing of the highest court of the State of
6 Massachusetts. My bar number is 558721.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed this 21st day of April 2014.
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A handwritten signature in dark ink, appearing to be "J. R. K. T.", is written over a horizontal line.

PROOF OF SERVICE

I, certify the following individuals were served with a copy of the foregoing document on the date and via the method of service identified below:

Service By Electronic Case Filing:

I served the above-named document by electronic filing via the U.S. Bankruptcy Court CM/ECF filing system to all those persons listed on the U.S. Bankruptcy Court ECF Confirmation Sheet.

Dated this 23rd day of April 2014.

/s/ Roger W. Wenthe
ROGER W. WENTHE
Assistant United States Attorney

DANIEL G. BOGDEN
United States Attorney
District of Nevada

BLAINE T. WELSH
Assistant United States Attorney
333Las Vegas Boulevard South, Suite 5000
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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

TELEXFREE, LLC,

☐ Affects this Debtor

☒ Affects all Debtors

☐ Affects TELEXFREE, INC.

☐ Affects TELEXFREE FINANCIAL, INC

) Case No.: BK-S-14-12524-abl

) Chapter 11

) **[PROPOSED]**

) **Jointly Administered with:**

) 14-12525-abl TelexFree, Inc.

) 14-12526-abl TelexFree Financial, Inc

) Application of Frank C. Huntington
) *pro hac vice*

) **No hearing required**

DECLARATION OF FRANK C. HUNTINGTON, ESQ.

I, Frank C. Huntington, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

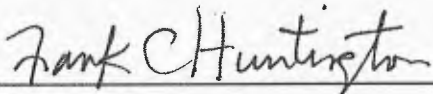
1. I am an attorney with the U.S. Securities & Exchange Commission
("Commission"), an agency of the federal government. In this capacity, I am assigned to

1 represent the United States in these bankruptcy proceedings for the purpose of representing the
2 Commission's interests. The Commission has an outstanding enforcement action against the
3 debtors and others in the District Court for the District of Massachusetts, *SEC v. TelexFree, Inc.*
4 *et al.*, Case No. 1:14-CV-11858.

5 2. I am a member in good standing of the highest court of the State of
6 Massachusetts. My bar number is 544045.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Executed this 22nd day of April 2014.

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12 Frank C. Huntington, Esq.
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Dated this 23rd day of April 2014.

/s/ Roger W. Wenthe
ROGER W. WENTHE
Assistant United States Attorney

DANIEL G. BOGDEN
United States Attorney
District of Nevada

BLAINE T. WELSH
Assistant United States Attorney
333 Las Vegas Boulevard South, Suite 5000
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Attorneys for the United States.

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DISTRICT OF NEVADA

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<input checked="" type="checkbox"/> Affects all Debtors)	14-12525-abl TelexFree, Inc.
)	14-12526-abl TelexFree Financial, Inc
)	
<input type="checkbox"/> Affects TELEXFREE, INC.)	Application of Sandra W. Lavigna
)	<i>Pro Hac Vice</i>
<input type="checkbox"/> Affects TELEXFREE FINANCIAL, INC)	[No Hearing Required]
)	
)	
)	

DECLARATION OF SANDRA W. LAVIGNA

I, Sandra W. Lavigna, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

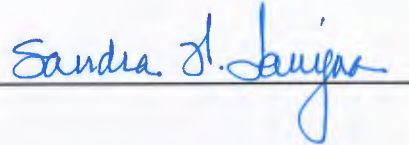
1. I am an attorney with the United States Securities and Exchange Commission, an agency of the federal government. In this capacity, I am assigned to represent the United States

1 in these bankruptcy proceedings for the purpose of representing the Commission's interests. The
2 Commission has an outstanding enforcement action against the debtors and others in the District
3 Court for the District of Massachusetts, *SEC v. TelexFree, Inc., et al.*, Case No. 1:14-CV-11858.

4 2. I am a member in good standing of the highest court of the State of California.
5 My bar number is 117965.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed this 22nd day of April 2014.

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Dated this 23rd day of April 2014.

/s/ Roger W. Wenthe
ROGER W. WENTHE
Assistant United States Attorney