

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS (Worcester)**

In re:

TELEXFREE, LLC,
TELEXFREE, INC.,
TELEXFREE FINANCIAL, INC.,
Debtors.

Chapter 11

Case No.: 14-40987-MSH

Case No.: 14-40988-MSH

Case No.: 14-40989-MSH

Jointly Administered

WALDEMARA MARTIN, et al.,
Plaintiffs,

v.

TELEXFREE, INC., et al.,
Defendants.

Adversary Proceeding No. 14-04044 MSH

**MOTION TO APPEAR TELEPHONICALLY AT THE AUGUST 28, 2014
HEARING ON TRUSTEE'S MOTION TO STAY THE ACTION**

Angel A. Cortiñas, William K. Hill, and Jonathan H Kaskel, counsel to Defendant International Payout Systems, Inc., move, pursuant to Rule 9074-1, for permission to appear telephonically at the hearing on Trustee's Motion to Stay Action, which is currently scheduled for August 28, 2014 at 2:00 p.m. Messrs. Cortiñas, Hill, and Kaskel are counsel at the Miami, Florida office of Gunster, Yoakley, and Stewart, P.A.*

Respectfully submitted,

GUNSTER

Counsel to International Payout Systems

By: /s/

Angel A. Cortiñas, FBN 797529

William K. Hill, FBN 747180

Jonathan H Kaskel, FBN 52718

* Undersigned was retained by International Payout Systems on August 22, 2014 and, on August 25, 2014, sought to appear *pro hoc vice*.



CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2014, the foregoing was served on the following Service List by ECF or through email (if listed), or U.S. mail.

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