

**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,

Adversary Proceeding
No. 16-4026

v.

ADVENT COMMUNICATIONS
CORPORATION,

Defendant.

MOTION BY TRUSTEE TO MODIFY PRE-TRIAL ORDER

Stephen Darr, as he is Trustee of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc. and TelexFree Financial, Inc. (the "Trustee") and as plaintiff herein, respectfully requests that the Court modify the pre-trial order previously entered in this adversary proceeding. In support thereof, the Trustee states that the parties engaged in a Rule 26(f) conference on May 20, 2016 and, simultaneously herewith, the parties have submitted their Rule 26(f) Certification and Discovery Plan. The Trustee requests that the dates referenced in the pre-trial order be modified to conform with the dates proposed by the parties in their discovery plan.

Good cause exists for the requested relief.

Wherefore, the Trustee prays that the Court:



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1. Modify the pre-trial order and discovery plan in accordance with the Rule 26(f)

Certification and Discovery Plan filed herewith; and

2. Grant such other relief as is just and proper.

**STEPHEN B. DARR AS TRUSTEE
OF THE CHAPTER 11 ESTATES OF
TELEXFREE, LLC, TELEXFREE, INC.
AND TELEXFREE FINANCIAL, INC.**

By his counsel,
MURPHY & KING
PROFESSIONAL CORPORATION

/s/ Andrew G. Lizotte
Charles R. Bennett, Jr. (BBO #037380)
Andrew G. Lizotte (BBO #559609)
Murphy & King Professional Corporation
One Beacon Street
Boston, Massachusetts 02108
(617) 423-0400
ALizotte@murphyking.com

Dated: June 3, 2016
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