

**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. 16-4027

v.

ATW TRAINING & CONSULTING, INC.,

Defendant.

Joint Motion to Extend Answer Deadline

Stephen Darr, the duly appointed and acting trustee of the Chapter 11 bankruptcy estates of TelexFree, Inc., TelexFree, LLC and TelexFree Financial, Inc. and the defendant hereby move by agreement to extend the deadline for the defendant to answer by 30 days, to June 30, 2016, to provide the defendant with additional time to review the allegations made in the complaint. The Defendant has provided the Trustee with an initial informal response in an effort to pursue consensual resolution.

Wherefore, the parties request that the Court approve the extension as set forth herein.



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STEPHEN DARR, CHAPTER 11
ESTATES OF EACH OF THE DEBTORS
By his attorneys,

/s/ Andrew G. Lizotte

Charles R. Bennett, Jr. (BBO #037380)

Andrew G. Lizotte (BBO #559609)

Murphy & King, Professional Corporation

One Beacon Street

Boston, MA 02108

(617) 423-0400

ALizotte@murphyking.com

ATW Training,

By counsel:

/s/ Miranda L. Hughes

Miranda L. Hughes Attorney

666 Grand Avenue

Suite 2000 Ruan Center

Des Moines, IA 50309

Dated: May 27, 2016

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CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby that on May 31, 2016, I caused to be served a copy of Joint Motion to Extend Answer Deadlines via operation of this Court's CM/ECF System and by First Class Mail, Postage Prepaid to the attached service list.

Miranda L. Hughes, Esq.
Brown, Winick, Graves, Gross,
Baskerville, & Schoenebaum P.L.C.
666 Grand Avenue
Suite 2000 Ruan Center
Des Moines, IA 50309

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108
Tel: 617-423-0400
Email: ALizotte@murphyking.com

Dated: May 31, 2016 (708259-v1A)