UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:

TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC.,

Debtors.

STEPHEN DARR, AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS,

Plaintiff,

v.

ADVENT COMMUNICATIONS CORPORATION,

Defendant.

Chapter 11 Cases

14-40987-MSH 14-40988-MSH 14-40989-MSH

Jointly Administered

Adversary Proceeding No. 16-4026

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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