UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

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.

CRAFT FINANCIAL SOLUTIONS, LLC, CRAFT TRUST FINANCIAL, LLC, a/k/a CRAFT TRUST SERVICES, LLC, JOSEPH CRAFT,

Defendants.

Chapter 11 Cases

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

Jointly Administered

Adversary Proceeding

No. 16-04035-MSH

ASSENTED-TO MOTION FOR THIRD EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendants Craft Financial Solutions, LLC, Craft Trust Financial, LLC, a/k/a Craft Trust Services, LLC, and Joseph Craft (collectively, "Craft"), by and through counsel, hereby move the Court to grant a twenty (20) day extension to file any pleadings response to the complaint, to July 26, 2016. Craft has discussed this motion with counsel for the Plaintiff, and Plaintiff assents to the extension of time. In support of its motion, Craft states as follows:

- 1. Plaintiff filed the complaint in this action on April 4, 2016;
- 2. Craft sought, and the Court granted, an extension of time to file any pleadings responsive to the complaint to June 6, 2016, see Docket Nos. 3 & 4;



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- 3. Craft then sought, and the Court granted, a second extension of time to file any pleadings responsive to the complaint to July 6, 2016, see Docket Nos. 9 & 10;
 - 4. Craft would like additional time to investigate the claims brought in the complaint;
 - 5. An additional twenty-day extension would not unduly prejudice the parties.

WHEREFORE, Craft prays that this Court grant this assented to request for an extension to file any responsive pleading until July 26, 2016, and any other relief it deems proper.

Respectfully submitted,

/s/ Jonathan C. Crafts

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Attorneys for Defendants Craft Financial Solutions, LLC, Craft Trust Financial, LLC, a/k/a Craft Trust Services, LLC, and Joseph Craft

Dated: July 6, 2016

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of July, 2016, the foregoing Assented-To Motion for Third Extension of Time was served via ECF and via electronic mail upon counsel for the Plaintiff, as listed below:

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/s/ Jonathan C. Crafts
Jonathan C. Crafts

Dated: July 6, 2016