UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:)
TELEXFREE, LLC, TELEXFREE, INC., and TELEXFREE FINANCIAL, INC., Debtors.)) Bankrupcty Case: 14-40987) Chapter 11) Judge Melvin S. Hoffman))
STEPHEN DARR, AS TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS, Plaintiff.))) Adversary No.: 16-04028
v.))
HANNA-SHEA CONSULTING, LLC,	,))
Defendant.))

DEFENDANT'S REQUEST FOR LEAVE TO PARTICIPATE BY TELEPHONE IN JULY 27, 2016 HEARING

On July 20, 2016, the Court issued its order setting defendant's motion for relief from the Clerk's Entry of Default for hearing on July 27, 2016. Because undersigned counsel for defendant is located in Indianapolis, Indiana, it would be cost-prohibitive for counsel to travel to Massachusetts for this hearing. Further, undersigned counsel is scheduled to take a deposition that afternoon in Indianapolis for a case that is set for trial in September 2016. Postponing the deposition at this late date would be difficult, if not impossible. For those reasons, defendant requests permission to participate in the July 27, 2016 hearing by telephone.



WHEREFORE, Hanna-Shea seeks permission for its undersigned counsel to participate by telephone in the July 27, 2016 hearing, together with all other just and proper relief.

Respectfully submitted,

/s/ F. Anthony Paganelli

F. Anthony Paganelli (IN 18425-53) Admitted *Pro Hac Vice* Counsel for Defendant

PAGANELLI LAW GROUP 10401 N. Meridian St., Suite 450 Indianapolis, IN 46290 Tel: 317/550-1855 Fax: 317/915-5886 Email: tony@paganelligroup.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed on July 12, 2016, using the Court's ECF system, which will provide notice of filing upon the following counsel of record:

Andrew G. Lizotte (alizotte@murphyking.com) Murphy & King, P.C. One Beacon Street Boston, MA 02108

/s/ F. Anthony Paganelli

F. Anthony Paganelli (IN 18425-53)

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ORDER GRANTING LEAVE FOR TELEPHONIC PARTICIPATION

Before the Court is the request by defendant Hanna-Shea Consulting, LLC for leave to participate by telephone in the hearing scheduled for July 27, 2016. The Court, having examined the motion, **NOW** FINDS that it is for good cause and should be granted. **IT IS THEREFORE ORDERED** that defendant's undersigned counsel may participate by telephone in the July 27, 2016 hearing. Defendant's counsel shall contact the Court's staff to make dial-in arrangements.

Dated:	
	Judge, U.S. Bankruptcy Court
	District of Massachusetts

Distribution: Counsel of Record