Docket #0099 Date Filed: 12/21/2017 Case 15-04055 Doc 99 Filed 12/21" Document Page 1 of 6

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:	Chapter 11
TELEXFREE LLC., et al., Debtors.) Case No. 14-40987) Jointly Administered)
STEPHEN B. DARR AS TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiffs,)))))
v. RITA DOS SANTOS, INDIVIDUALLY AND AS PUTATIVE CLASS REPRESENTATIVE, AND	Adversary Proceeding No. 15-04055 Adversary Proceeding No. 15-04055
MARIA MURDOCH, ANGELA BATISTA JIMINEZ, ELISANGELA OLIVEIRA AND DIOGO DE ARAUGO, AS PUTATIVE CLASS REPRESENTATIVES, Defendants.)))))

ASSENTED TO MOTION OF THE PLAINTIFFS' INTERIM EXECUTIVE COMMITTEE TO EXTEND THE DEADLINE TO OBJECT TO THE COURT'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW ON CROSS-MOTIONS FOR SUMMARY JUDGMENT

The Plaintiffs' Interim Executive Committee (the "PIEC"), appointed by the United States District Court in this District as the representative of the victims of the Debtors' Ponzi scheme by orders entered in the multi-district litigation proceedings captioned In re TelexFree Securities Litigation, MDL No. 14-02566 (D. Mass.), hereby moves the Court to extend the

The debtors (the "Debtors") in these cases (collectively, the "Chapter 11 Cases") are TelexFree, LLC, TelexFree, Inc., and TelexFree Financial.



Case 15-04055 Doc 99 Filed 12/21/17 Entered 12/21/17 16:04:32 Desc Main Document Page 2 of 6

deadline for the PIEC to object to the Court's Proposed Findings of Fact and Conclusions of Law on Cross-Motions for Summary Judgment (the "<u>Proposed Findings</u>") [Doc. 98] by 10 days to January 12, 2018. The Chapter 11 Trustee has agreed to the extension.

- 1. Pursuant to Federal Rule of Bankruptcy Procedure 9033, the PIEC has fourteen days from the date of service to object to the Proposed Findings. The current deadline to respond is January 2, 2018 (the "Objection Deadline").
- 2. In light of the impending Christmas and New Year holidays, the PIEC respectfully requests an extension to allow it to adequately respond to the Proposed Findings. Accordingly, the PIEC respectfully requests that the Objection Deadline be postponed to January 12, 2018.
 - 3. No party will be prejudiced by this extension, and the Trustee has assented to it.

[Remainder of page intentionally left blank]

Dated: December 21, 2017 Boston, Massachusetts

BONSIGNORE, PLLC

/s/ Robert J. Bonsignore
Robert J. Bonsignore
NH Bar 21241
3771 Meadowcrest Drive
Las Vegas, Nevada 89121
Telephone: 781-856-7650
rbonsignore@classactions.us
Interim Lead Counsel

BROWN RUDNICK LLP

/s/ William R. Baldiga
William R. Baldiga (BBO #542125)
Kellie W. Fisher (BBO #693590)
One Financial Center
Boston, MA 02111

Telephone: (617) 856-8200 Facsimile: (617) 856-8201 wbaldiga@brownrudnick.com kfisher@brownrudnick.com

For the Plaintiffs' Interim Executive Committee

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:) Chapter 11
TELEXFREE LLC., et al., ² Debtors.) Case No. 14-40987) Jointly Administered)
STEPHEN B. DARR AS TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiffs,)))) Adversary Proceeding No. 15-04055)
v.)))
RITA DOS SANTOS, INDIVIDUALLY AND AS PUTATIVE CLASS REPRESENTATIVE, AND)))
MARIA MURDOCH, ANGELA BATISTA JIMINEZ, ELISANGELA OLIVEIRA)
AND DIOGO DE ARAUGO, AS PUTATIVE CLASS REPRESENTATIVES,))
Defendants.	,)

ORDER GRANTING ASSENTED TO MOTION OF THE PLAINTIFFS' INTERIM EXECUTIVE COMMITTEE TO EXTEND THE DEADLINE TO OBJECT TO THE COURT'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW ON CROSS-MOTIONS FOR SUMMARY JUDGMENT

Upon consideration of the Assented To Motion of the Plaintiffs' Interim Executive Committee to Extend the Deadline to Object to the Court's Proposed Findings of Fact and Conclusions of Law on Cross-Motions for Summary Judgment (the "Motion") filed by the Plaintiffs' Interim Executive Committee (the "PIEC"), it is hereby **ORDERED**, that the Motion

The debtors (the "<u>Debtors</u>") in these cases (collectively, the "<u>Chapter 11 Cases</u>") are TelexFree, LLC, TelexFree, Inc., and TelexFree Financial.

Case 15-04055 Doc 99 Filed 12/21/17 Entered 12/21/17 16:04:32 Desc Main Document Page 5 of 6

is hereby **GRANTED**; and it is further **ORDERED**, that the PIEC's deadline to object to the Court's Proposed Findings of Fact and Conclusions of Law on Cross-Motions for Summary Judgment is extended to January 12, 2018.

Dated: ______, 2017

Boston, Massachusetts

The Honorable Melvin S. Hoffman United States Bankruptcy Judge

CERTIFICATE OF SERVICE

The undersigned certifies that on December 21, 2017, the foregoing document was filed electronically, and therefore was sent by email to those receiving CM/ECF notices from the Court's electronic filing system. I further certify that I have caused to be sent by first class mail a copy to the following parties on this 21st day of December, 2017.

Charles R. Bennett, Jr., Esq. Murphy & King, Professional Corporation One Beacon Street Boston, MA 02108

Richard King, Asst. United States Trustee Office of the United States Trustee 446 Main Street 14th Floor Worcester, MA 01608

> /s/ William R. Baldiga William R. Baldiga

62932707 v1