

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

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

TelexFree.

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 MARIA MURDOCH, ANGELA
BATISTA JIMENEZ, ELISANGELA
OLIVEIRA AND DIOGO DE ARAUGO, AS
PUTATIVE CLASS REPRESENTATIVES,

Defendants.

Chapter 11 Cases

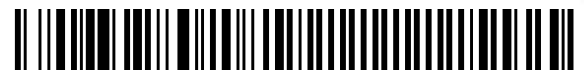
14-40987-MSH
14-40988-MSH
14-40989-MSH

Jointly Administered

Adversary Proceeding
No. 15-04055

**MOTION BY TRUSTEE TO EXTEND TIME TO FILE RESPONSE TO
OBJECTIONS TO THE BANKRUPTCY COURT'S DECEMBER 19, 2017
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW ON
CROSS-MOTIONS FOR SUMMARY JUDGMENT**

Stephen B. Darr, the duly appointed trustee (the "Trustee") of the above captioned Debtors, respectfully moves that the Court extend by fourteen (14) days the deadline for the Trustee to file a response to the *Objections to the Bankruptcy Court's December 19, 2017 Proposed Findings of Fact and Conclusions of Law on Cross-Motions for Summary Judgment*



(the "Objection"). The Plaintiffs Interim Executive Committee ("PIEC") has agreed to the extension. In further support, the Trustee states as follows:

1. The Objection was filed on January 12, 2018.
2. Pursuant to Federal Rule of Bankruptcy Procedure 9033, the Trustee otherwise has fourteen (14) days from the filing of the Objection, or through January 26, 2018, in which to file a response to the Objection.
3. The Trustee requires a brief additional time period to adequately respond to the Objection.
4. No party will be prejudiced by this extension, which is assented to.

Wherefore, the Trustee prays that the Court:

- a. Extend the time in which the Trustee may respond to the Objection by 14 days, through and including February 9, 2018; and
- b. Grant such other relief as is just and proper.

Respectfully submitted,

STEPHEN B. DARR, CHAPTER 11
TRUSTEE,
By his counsel:

Dated: January 19, 2018

/s/ Andrew G. Lizotte
Harold B. Murphy (BBO #362610)
Charles R. Bennett, Jr. (BBO #037380)
Andrew G. Lizotte (BBO #559609)
MURPHY & KING,
Professional Corporation
One Beacon Street
Boston, MA 02108
Telephone: (617) 423-0400
ALizotte@murphyking.com

738138

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

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

Debtors.

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 MARIA MURDOCH, ANGELA
BATISTA JIMENEZ, ELISANGELA
OLIVEIRA AND DIOGO DE ARAUGO, AS
PUTATIVE CLASS REPRESENTATIVES,

Defendants.

Chapter 11 Cases

14-40987-MSH

14-40988-MSH

14-40989-MSH

Jointly Administered

Adversary Proceeding
No. 15-04055

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on January 19, 2018, I caused to be served a copy of the *Motion by Trustee to Extend Time to File Response to Objections to the Bankruptcy Court's December 19, 2017 Proposed Findings of Fact and Conclusions of Law on Cross-Motions for Summary Judgment* by this Court's CM/ECF System to:

William R. Baldiga, Esq.
Brown Rudnick LLP
One Financial Center
Boston, MA 02111
wbaldiga@brownrudnick.com

Ilyas Rona, Esq.
Milligan, Rona, Duran & King
50 Congress Street
Boston, MA 02109
ijr@mrdklaw.com,
gnc@mrdklaw.com, kae@mrdklaw.com

/s/ Andrew G. Lizotte

Andrew G. Lizotte (BBO #559609)
MURPHY & KING, Professional Corporation
One Beacon Street
Boston, MA 02108-3107
Tel: (617) 423-0400
Fax: (617) 556-8985
Email: ALizotte@murphyking.com

DATED: January 19, 2018
738155