

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:
Telexfree, LLC,
Telefree, Inc., and
Telexfree Financial, Inc.,
Debtors.

Chapter 11
Case No. 14-40987-MSH
Case No. 14-40988-MSH
Case No. 14-40989-MSH

(Jointly Administered)

EXPEDITED MOTION FOR LEAVE TO FILE A LATE ELECTRONIC
PROOF OF CLAIM FOR RITA D. DOS SANTOS

1. Now comes Rita D. Dos Santos (Movant) who moves for leave to file a late Electronic Proof of Claim (ePOC).
2. The movant has been proceeding without counsel since 2016. See affidavit by her former counsel, Ronald P. Passatempo, attached as **Exhibit 1**.
3. In 2014, Movant filed a timely proof of claim with Kurtzman Carson Consultants, LLC ("KCC"). See **Exhibit 2**.
4. Based on that filing, Movant unequivocally believed that she had a timely filed Proof of Claim and that was all she was required to do in order for her to have a valid claim against Telexfree, entitling her to receive monies when distributed to approved Claimants. See **Exhibit 3**- Movant's Affidavit in support of Motion.
5. However, Movant files this expedited Motion because she recently learned from a friend, who is a lawyer (but not her lawyer on this matter) that because she did *not re-file* her claim through the Telexfree electronic claims portal, which was established in 2016, two years after Movant had filed her claim with KCC, she realized that she did not have a recognized and

As no basis was provided, the request for expedited treatment is denied. The motion will be held for objections.

