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 REQUEST TO REINSTATE PROOF OF CLAIM FILED FOR EDIVALDO ALVES REIS AND TIME TO FILE SUPPORTING DOCUMENTS

- 1. Now comes Edivaldo Alves Reis (Movant) who moves to have the Court reinstate his Proof of Claim (#66876).
- 2. Movant has been proceeding without counsel since 2016. See affidavit from attorney Ronald P. Passatempo attached as **Exhibit 1.**
- 3. Movant filed a timely Electronic Proof of Claim.
- 4. However, Movant files this expedited Motion because Movant recently learned that his claim was disallowed by the Trustee for failure to respond to the Trustee's inquiries and because his claim did not match any of the user accounts found in the Telexfree records.
- 5. Movant was born in Brazil and has minimal understanding of the English language and has no computer skills. See **Exhibit 2-** Movant's Affidavit in support of Motion.
- 6. Movant has no memory or knowledge of receiving any notices or inquires from the Trustee regarding his claim.



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