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*Proposed Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PARETEUM CORPORATION, *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No.: 22-\_\_\_\_ ( )

(Joint Administration Requested)

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER  
(I) AUTHORIZING THE DEBTORS TO (A) MAINTAIN A LIST OF  
CREDITORS IN LIEU OF SUBMITTING A FORMATTED  
MAILING MATRIX, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS’  
TOP THIRTY CREDITORS AND (II) ESTABLISHING PROCEDURES FOR  
NOTIFYING PARTIES OF THE COMMENCEMENT OF THESE CHAPTER 11 CASES**

The debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”) respectfully state the following in support of this motion (this “Motion”):

**Relief Requested**

1. The Debtors seek entry of an order, substantially in the form attached hereto as

**Exhibit A**: (i) authorizing the Debtors to (a) maintain a consolidated list of creditors

(the “Creditor Matrix”) in lieu of submitting a separate mailing matrix for each Debtor, (b) file a

<sup>1</sup> The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, if applicable, are: Pareteum Corporation (7538); Pareteum North America Corp. (f/k/a Elephant Talk North America Corp.) (9623); Devicescape Holdings, Inc. (2909); iPass, Inc. (4598); iPass IP LLC (2550); Pareteum Europe B.V.; Artiliium Group Ltd. (f/k/a Artiliium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artiliium N.V.). The Debtors’ corporate headquarters is located at 1185 Avenue of the Americas, 2nd Floor, New York, NY 10036.



consolidated list of the Debtors' thirty largest unsecured creditors, and (ii) establishing procedures for notifying parties of the commencement of these Chapter 11 Cases.<sup>2</sup>

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of New York (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012. The Debtors confirm their consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), to the Court entering a final order in connection with this Motion to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105(a), 107(c), 342(a), and 521 of title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rules 1007, 2002, and 9013, and Rules 1007-1, 5075-1, and 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the "Local Rules").

### **Background**

5. On the date hereof (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. A detailed description surrounding the facts and circumstances of these Chapter 11 Cases is set forth in the *Declaration of Laura W.*

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<sup>2</sup> Pursuant to an agreement with the U.S. Trustee, the version of the Creditor Matrix that will be available on the Debtors' case website ([www.kccllc.net/pareteum](http://www.kccllc.net/pareteum)) will be redacted solely with respect to individual creditors' names and addresses; individual creditors' names and addresses, however, can be found on the Court's docket or upon request to the Debtors.

*Thomas in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* (the "First Day Declaration"), filed contemporaneously with this Motion.<sup>3</sup>

6. The Debtors continue to operate their businesses and manage their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Concurrent with the filing of this Motion, the Debtors filed a motion requesting procedural consolidation and joint administration of these Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b). No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases, and no committees have been appointed or designated.

### **Basis for Relief**

#### **I. Cause Exists to Authorize the Debtors to Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix.**

7. Section 521(a) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), and Local Rule 1007-1(a) require a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each creditor. In addition, Bankruptcy Rule 1007(d) requires a debtor to file a list containing the name, address, and claim of the creditors holding the twenty largest unsecured claims against the debtor.

8. Permitting the Debtors to maintain a consolidated list of their creditors in electronic format only, in lieu of each Debtor filing a creditor matrix, is warranted under the circumstances of these cases. Because the Debtors have many thousands of potential creditors and other parties-in-interest, and the preparation of a separate list of creditors for each Debtor would be expensive, time consuming, administratively burdensome, and of little incremental benefit.

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<sup>3</sup> Capitalized terms not defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

9. The Debtors, working together with Kurtzman Carson Consultants LLC as their notice and claims agent in these Chapter 11 Cases (the “Claims and Noticing Agent”),<sup>4</sup> have already prepared a single, consolidated list of the Debtors’ creditors in electronic format, and are prepared to make such Creditor Matrix available in electronic form to any party-in-interest who so requests (or in non-electronic form at such requesting party’s sole cost and expense) in lieu of submitting a mailing matrix to the clerk of this Court.

10. The Debtors submit that the proposed maintenance of the Creditor Matrix with the Proposed Claims and Noticing Agent is consistent with applicable Local Rules. Pursuant to Local Rule 5075-1, a debtor filing a petition with more than 250 creditors and equity interest holders, in the aggregate, as is the case here, is required to retain an approved claims and noticing agent pursuant to an order of this Court.

11. Courts in this jurisdiction have approved relief similar to the relief requested herein with respect to preparation of a consolidated, electronic list of a debtor’s creditors. *See, e.g., In re Deluxe Media*, No. 19-23774 (RDD) (Bankr. S.D.N.Y. Oct. 9, 2019) (authorizing the debtors to prepare a list of creditors in lieu of submitting a formatted mailing matrix); *In re Barneys New York, Inc.*, No. 19-36300 (CGM) (Bankr. S.D.N.Y. Nov. 4, 2019); *In re Hollander Sleep Products, LLC*, No. 19-11608 (MEW) (Bankr. S.D.N.Y. June 4, 2019); (same); *In re Sungard Availability Services Capital, Inc.*, No. 19-22915 (RDD) (Bankr. S.D.N.Y. May 2,

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<sup>4</sup> The request to retain the Claims and Noticing Agent is made pursuant to section 156(c) of title 28 of the United States Code, which empowers the Court to use outside facilities or services pertaining to the provision of notice of administrative information to parties-in-interest so long as the costs of the services are paid for out of assets of the estate. *See* 28 U.S.C. § 156(c); *see also Debtors’ Application for Entry of an Order (I) Authorizing and Approving the Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent, Effective Nunc Pro Tunc to the Petition Date, and (II) Granting Related Relief*, filed contemporaneously herewith.

2019) (same); *In re Windstream Holdings, Inc.*, No. 19-22312 (RDD) (Bankr. S.D.N.Y. Mar. 5, 2019) (same).<sup>5</sup>

**II. Cause Exists to Authorize the Debtors to File a Single Consolidated List of the Debtors' Thirty Largest Unsecured Creditors.**

12. Bankruptcy Rule 1007(d) provides that a debtor shall file “a list containing the name, address, and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders.” Because certain of the Debtors share many creditors and the Debtors operate as a single business enterprise, the Debtors request authority to file a single, consolidated list of their thirty largest general unsecured creditors.

13. Compiling separate top twenty creditor lists for each individual Debtor would consume a substantial amount of the Debtors' time and resources. Further, the Debtors believe a single, consolidated list of the Debtors' thirty largest unsecured, non-insider creditors will aid the United States Trustee for the Southern District of New York (the “U.S. Trustee”) in its efforts to communicate with these creditors. Filing a single consolidated list of the thirty (30) largest unsecured creditors in these Chapter 11 Cases is appropriate for these reasons.

14. Courts in this jurisdiction have approved relief similar to the relief requested herein with respect to filing a single consolidated list of the largest unsecured creditors of a debtor and its debtor affiliates. *See, e.g., In re Deluxe Media*, No. 19-23774 (RDD) (Bankr. S.D.N.Y. Oct. 9, 2019) (providing authorization for the debtors to file a single list of their thirty largest unsecured creditors); *In re Barneys New York, Inc.*, No. 19-36300 (CGM) (Bankr. S.D.N.Y. Nov. 4, 2019) (same); *In re Hollander Sleep Products, LLC*, No. 19-11608 (MEW) (Bankr. S.D.N.Y. June 4, 2019) (authorizing the debtors to file a single list of their thirty largest

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<sup>5</sup> Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these cited orders are available upon request to the Debtors' proposed counsel.

unsecured creditors); *In re Sungard Availability Services Capital, Inc.*, No. 19-22915 (RDD) (Bankr. S.D.N.Y. May 2, 2019) (authorizing the debtors to file a single list of their thirty largest unsecured creditors); *In re Windstream Holdings, Inc.*, No. 19-22312 (RDD) (Bankr. S.D.N.Y. Mar. 5, 2019) (authorizing the debtors to file a single consolidated list of their thirty largest unsecured creditors).<sup>6</sup>

### **III. The Court Should Authorize the Claims and Noticing Agent to Mail Required Notices to Creditors.**

15. Bankruptcy Rule 2002(a)(1) provides that the clerk (or other person directed by the Court) must give the debtor, the U.S. Trustee, all creditors, and any indenture trustee at least twenty-one days' notice by mail of the meeting of creditors under section 341 of the Bankruptcy Code. Bankruptcy Rule 2002(f)(1) further provides that notice of "the order for relief" shall be sent by mail to all creditors.

16. The Debtors propose that the Claims and Noticing Agent undertake all mailings directed by the Court or the U.S. Trustee, or as required by section 342(a) of the Bankruptcy Code and Bankruptcy Rules 2002 (a) and (f), including the notice of commencement of these Chapter 11 Cases, substantially in the form attached as Exhibit 1 to Exhibit A attached hereto. The Debtors believe that using the Claims and Noticing Agent to promptly provide notices to all applicable parties will maximize efficiency in administering these Chapter 11 Cases and will ease administrative burdens that would otherwise fall upon the Court and the U.S. Trustee. Additionally, the Claims and Noticing Agent will assist the Debtors in preparing creditor lists and mailing initial notices, and therefore there are efficiencies in authorizing the Claims and

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<sup>6</sup> Because of the voluminous nature of the orders cited herein, such orders have not been attached to this motion. Copies of these cited orders are available upon request to the Debtors' proposed counsel.

Noticing Agent to mail the notice of commencement of these Chapter 11 Cases. Accordingly, the Debtors respectfully submit that the Claims and Noticing Agent should undertake such mailings.

**Motion Practice**

17. This Motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their applications to this Motion. Accordingly, the Debtors submit that this Motion satisfies Local Rule 9013-1(a).

**The Requirements of Bankruptcy Rule 6003 Are Satisfied**

18. Bankruptcy Rule 6003 empowers a court to grant relief within the first twenty-one days after the Petition Date “to the extent that relief is necessary to avoid immediate and irreparable harm.” For the reasons discussed above, the Debtors believe an immediate and orderly transition into chapter 11 is critical to the viability of their operations and that any delay in granting the relief requested could hinder the Debtors’ operations and cause irreparable harm. The motion requests relief from procedural rules and requirements that pertain to matters of immediate significance or which involve deadlines sooner than twenty-one days after the Petition Date. Accordingly, the Debtors submit that they have satisfied the “immediate and irreparable” standard of Bankruptcy Rule 6003 to support granting the relief requested herein.

**Notice**

19. The Debtors will provide notice of this Motion to the following parties and/or their respective counsel, as applicable: (a) the U.S. Trustee; (b) counsel to the administrative agent under the DIP credit facility, DLA Piper LLP (US), 1251 Avenue of the Americas, 27th Floor, New York, NY 10153, Attn: Jamila Justine Willis (jamila.willis@us.dlapiper.com), Shmuel Klahr (Shmuel.klahr@us.dlapiper.com), Nadia Saleem (Nadia.Saleem@us.dlapiper.com), and Gregory Juell (gregory.juell@us.dlapiper.com); (c) counsel to the administrative agent under the Bridge Loan, DLA Piper LLP (US), 1251 Avenue

of the Americas, 27th Floor, New York, NY 10153, Attn: Jamila Justine Willis (jamila.willis@us.dlapiper.com), Shmuel Klahr (Shmuel.klahr@us.dlapiper.com), Nadia Saleem (Nadia.Saleem@us.dlapiper.com), and Gregory Juell (gregory.juell@us.dlapiper.com); (d) counsel to the administrative agent under the Debtors' Prepetition Senior Notes, DLA Piper LLP (US), 1251 Avenue of the Americas, 27th Floor, New York, NY 10153, Attn: Jamila Justine Willis (jamila.willis@us.dlapiper.com), Shmuel Klahr (Shmuel.klahr@us.dlapiper.com), Nadia Saleem (Nadia.Saleem@us.dlapiper.com), and Gregory Juell (gregory.juell@us.dlapiper.com); (e) counsel to the administrative agent under the Junior Convertible Notes, Attn: Geoffrey van der Hauw (g.van.der.hauw@lexence.com); (f) counsel to the Stalking Horse Bidders, (i) DLA Piper LLP (US), 1251 Avenue of the Americas, 27th Floor, New York, NY 10153, Attn: Jamila Justine Willis (jamila.willis@us.dlapiper.com), Shmuel Klahr (Shmuel.klahr@us.dlapiper.com), Nadia Saleem (Nadia.Saleem@us.dlapiper.com), and Gregory Juell (gregory.juell@us.dlapiper.com), and (ii) Geoffrey van der Hauw (g.van.der.hauw@lexence.com); (g) the parties identified on the Debtors' consolidated list of 30 largest unsecured creditors; (h) the United States Attorney's Office for the Southern District of New York; (i) the Internal Revenue Service; (j) the Securities and Exchange Commission; (k) the attorneys general for the states where the Debtors conduct business operations; (l) the Federal Communications Commission; and (m) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Request**

20. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as is just and proper.

Dated: May 15, 2022  
New York, New York

PARETEUM CORPORATION, *ET AL.*  
*Debtors and Debtors in Possession*  
*By their Proposed Counsel*  
TOGUT, SEGAL & SEGAL LLP,  
By:

/s/ Frank A. Oswald  
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**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PARETEUM CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 22-\_\_\_\_ ( )

(Joint Administration Requested)

**ORDER (I) AUTHORIZING THE DEBTORS TO (A) MAINTAIN A LIST OF CREDITORS IN LIEU OF SUBMITTING A FORMATTED MAILING MATRIX, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' TOP THIRTY CREDITORS, AND (II) ESTABLISHING PROCEDURES FOR NOTIFYING PARTIES OF THE COMMENCEMENT OF THESE CHAPTER 11 CASES**

Upon the motion (the "Motion")<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order"), (i) authorizing the Debtors to (a) maintain a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor, (b) file a consolidated list of the Debtors' thirty largest unsecured creditors, and (ii) establishing procedures for notifying parties of the commencement of these Chapter 11 Cases, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that

<sup>1</sup> The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Pareteum Corporation (7538); Pareteum North America Corp. (f/k/a Elephant Talk North America Corp.) (9623); Devicescape Holdings, Inc. (2909); iPass, Inc. (4598); iPass IP LLC (2550); Pareteum Europe B.V.; Artilium Group Ltd. (f/k/a Artilium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artilium N.V.). The Debtors' corporate headquarters is located at 1185 Avenue of the Americas, 2nd Floor, New York, NY 10036.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings given to such terms in the Motion.

venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties-in-interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. As soon as practicable after entry of an order authorizing the engagement of the proposed Claims and Noticing Agent in these Chapter 11 Cases, the Debtors shall furnish to the Claims and Noticing Agent a consolidated creditor list.
3. In lieu of submitting a formatted mailing matrix, the Debtors, with the assistance of the Claims and Noticing Agent (upon the Court's approval of the Debtors' retention of the Claims and Noticing Agent), file the Creditor Matrix on the Court's docket and provide the Creditor Matrix in electronic form to the Court, the U.S. Trustee, and counsel to an official committee of unsecured creditors appointed in these Chapter 11 Cases (if any) and, upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases, any party in interest.

4. The Debtors are authorized to post a version of the Creditor Matrix on the case website established by the proposed Claims and Noticing Agent ([www.kccllc.net/pareteum](http://www.kccllc.net/pareteum)) that does not specify the names or addresses of individual creditors.

5. The notice of commencement of these chapter 11 cases, substantially in the form attached to this Order as Exhibit 1, is hereby approved.

6. The Debtors are authorized to file a consolidated list of the thirty largest unsecured creditors in these Chapter 11 Cases in lieu of each Debtor filing a list of its twenty largest unsecured creditors.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2022  
New York, New York

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THE HONORABLE [ \_\_\_\_\_ ]  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Notice of Commencement**

<b>Information to identify the case:</b>			
Debtor <u>Pareteum Corporation</u>	EIN <u>95-4557538</u>		
Name			
United States Bankruptcy Court for the: <u>Southern</u> District of <u>New York</u>	Date case filed for Chapter 11	<u>05/15/2022</u>	
(State)		MM/DD/YYYY	
Case number: <u>22-</u> ( )			

Official Form 309F (For Corporations or Partnerships)

**Notice of Chapter 11 Bankruptcy Case**

12/17

**For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered. This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.**

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at [www.pacer.gov](http://www.pacer.gov)).

In addition such documents can be viewed and/or obtained from the Debtors' proposed notice and claims agent, Kurtzman Carson Consultants LLC at <http://www.kccllc.net/Pareteum> or by calling (888) 201-2205 (toll free) for U.S./Canada based parties or (310) 751-1839 for International parties. Note that you need a PACER password and login to access documents on the Bankruptcy Court's website (a PACER password is obtained by accessing the PACER website, [www.pacer.gov](http://www.pacer.gov)).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

<b>1. Debtors' Full Names</b>	<b>Case Nos.</b>	<b>Employer ID Nos. (EIN)</b>
Pareteum Corporation	Case No. 22-____ ( )	95-4557538
Pareteum North America Corp.	Case No. 22-____ ( )	46-2219623
Devicescape Holdings, Inc.	Case No. 22-____ ( )	52-2322909
iPass, Inc.	Case No. 22-____ ( )	93-1214598
iPass IP LLC	Case No. 22-____ ( )	83-1192550
Pareteum Europe B.V.	Case No. 22-____ ( )	34252209
Artidium Group Ltd. (f/k/a Artidium PLC)	Case No. 22-____ ( )	3904535
Pareteum Asia Pte. Ltd.	Case No. 22-____ ( )	201816006N
Pareteum N.V. (f/k/a Artidium N.V.)	Case No. 22-____ ( )	0468.433.091

**For more information, see pages 2-3**

Debtor Pareteum Corporation

Case number (if known) 22- ( )

2.	<p><b>All other names used in the last 8 years</b></p> <p>Pareteum North America Corp. was formerly known as Elephant Talk North America Corp.</p> <p>Artilium Group Ltd. was formerly known as Artilium PLC.</p> <p>Pareteum N.V. was formerly known as Artilium N.V.</p>	
3.	<p><b>Address</b></p>	<p>1185 Avenue of Americas, 2<sup>nd</sup> FL, New York, NY 10036</p>
4.	<p><b>Debtors' Attorney</b></p>	<p>Togut Segal &amp; Segal LLP                  Frank A. Oswald                  Brian F. Moore                  Amy M. Oden                  One Penn Plaza, Suite 3335                  New York, New York 10119                  Contact Phone: (212) 594-5000                  frankoswald@teamtogut.com                  bmoore@teamtogut.com                  aoden@teamtogut.com</p>
5.	<p><b>Bankruptcy Clerk's Office</b>                  United States Bankruptcy Court                  Southern District of New York                  One Bowling Green                  New York, NY 10004</p>	<p>Hours Open: 8:30 a.m. to 5:00 p.m.                  Contact phone: (212) 668-2870</p>
6.	<p><b>Meeting of Creditors</b>  <i>The Debtors' representative must be present at the meeting to be questioned under oath.</i> Creditors are welcome to attend, but are not required to do so. The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.</p>	<p>Date: To be determined.                  Location: To be determined.                  Time: To be determined.                  (Notice of the date, time and location will be provided once the meeting is set.)</p>

Debtor Pareteum Corporation

Case number (if known) 22- ( )

<p><b>7. Proof of Claim Deadline</b></p>	<p><b>Deadline for filing proof of claim:</b> Not yet set. If deadline is set, the court will send you another notice.</p> <p>A proof of claim is a signed statement describing a creditor’s claim. A proof of claim form may be obtained at <a href="http://www.uscourts.gov">www.uscourts.gov</a> or any bankruptcy clerk’s office.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> <li>▪ your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>;</li> <li>▪ you file a proof of claim in a different amount; or</li> <li>▪ you receive another notice.</li> </ul> <p>If your claim is not scheduled or if your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the Bankruptcy Clerk’s office or online at <a href="http://www.pacer.gov">www.pacer.gov</a>.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>
<p><b>8. Exception to Discharge Deadline</b> The Bankruptcy Clerk’s Office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below</p> <p><b>Deadline for filing the complaint:</b> <u>Not yet set. Notice will be provided when deadline is set.</u></p>
<p><b>9. Creditors with a Foreign Address</b></p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about right in this case.</p>
<p><b>10. Filing a Chapter 11 Bankruptcy Case</b></p>	<p>Bankruptcy cases under Chapter 11 of the Bankruptcy Code have been filed in this court by the Debtors listed on the first page, and orders for relief have been entered. Chapter 11 allows the Debtors to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the court. You may receive a copy of a plan and a disclosure statement telling you about a plan, and you might have the opportunity to vote on a plan. You will receive notice of the date of a confirmation hearing, and you may object to confirmation of a plan and attend a confirmation hearing. Unless a trustee is serving, the Debtors will remain in possession of the Debtors' property and may continue to operate any business.</p>
<p><b>11. Discharge of Debts</b></p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor, except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the Bankruptcy Clerk’s Office by the deadline.</p>