

**COLE SCHOTZ P.C.**

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*Attorneys for Anthony M. Saccullo, in his  
capacity as Liquidating Trustee for the  
TEUM Liquidating Trust*

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

In re:

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

Debtors.

Chapter 11

Case No. 22-10615 (LGB)

(Jointly Administered)

**CERTIFICATION OF NO OBJECTION REGARDING FOURTH MOTION  
OF ANTHONY M. SACCULLO, IN HIS CAPACITY AS LIQUIDATING  
TRUSTEE FOR THE TEUM LIQUIDATING TRUST, FOR ENTRY OF AN  
ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

1. The undersigned counsel certifies that on September 27, 2024, Anthony M. Saccullo, in his capacity as Liquidating Trustee for the TEUM Liquidating Trust (the “**Trustee**”), filed and duly served the Fourth Motion of Anthony M. Saccullo, in His Capacity as Liquidating Trustee for the Teum Liquidating Trust, for Entry of an Order Extending the Time to File Objections to Claims [Doc. No. 578] (the “**Motion**”) and notice thereof (the “**Notice**”).

<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.; Artidium Group Ltd. (f/k/a Artidium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artidium N.V.). The Debtors’ corporate headquarters is located at 1185 Avenue of the Americas, 2nd Floor, New York, New York 10036.



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2. As set forth in the Notice, a hearing on the Motion before the Bankruptcy Court is scheduled for **December 18, 2024 at 10:00 a.m. (ET)** (the “**Hearing**”) and responses or objections to the Motion, if any, were to be filed and served so as to be actually received no later than **October 11, 2024 at 4:00 p.m. (ET)** (the “**Objection Deadline**”).

3. The undersigned counsel hereby certifies that, as of the date hereof, no responses or objections to the Motion have been received. Undersigned counsel further represents that she has reviewed the docket in these cases and, as of the date hereof, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon.

4. In accordance with Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed at least forty-eight (48) hours after the Objection Deadline.

5. Due to the foregoing, it is respectfully requested that the Court enter the proposed form of order that was attached to the Motion, a copy of which is attached hereto as **Exhibit A**.

Dated: New York, New York  
October 17, 2024

**COLE SCHOTZ P.C.**

By: /s/ Seth Van Aalten  
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*Attorneys for Anthony M. Saccullo, in his  
capacity as Liquidating Trustee, for the  
TEUM Liquidating Trust*

**EXHIBIT A**

**Proposed Order**

**COLE SCHOTZ P.C.**

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

In re:

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

Chapter 11

Case No. 22-10615 (LGB)

(Jointly Administered)

**ORDER GRANTING FOURTH MOTION OF ANTHONY M. SACCULLO,  
IN HIS CAPACITY AS LIQUIDATING TRUSTEE FOR THE TEUM  
LIQUIDATING TRUST FOR ENTRY OF AN ORDER EXTENDING  
THE TIME TO FILE OBJECTIONS TO CLAIMS**

Upon consideration of the motion (the “Motion”) of Anthony M. Saccullo, in his capacity as Liquidating Trustee for the TEUM Liquidating Trust (the “Trustee”) for entry of an order pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006(b)(1) extending the Claims Objection Deadline; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding

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<sup>1</sup> The Debtors in these 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.; Artidium Group Ltd. (f/k/a Artidium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artidium N.V.) (collectively, the “Debtors”) The mailing address of the Debtors, solely for the purposes of notices and communications, is c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the relief requested being in the best interests of the Trust, the Debtors, their estates, and all other parties in interest; and after due deliberation thereon and good and sufficient cause appearing therefor, it is hereby

**ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is granted to the extent set forth herein.
2. The Claims Objection Deadline is hereby extended through and including April 16, 2025, without prejudice to the rights of the Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation, implementation, or enforcement of this Order.

Dated: \_\_\_\_\_, 2024  
New York, New York

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THE HONORABLE LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE