

**COLE SCHOTZ P.C.**

Seth Van Aalten, Esq.  
Cameron A. Welch, Esq.  
Krista L. Kulp, Esq.  
1325 Avenue of the Americas – 19<sup>th</sup> Floor  
New York, New York 10019  
(212) 752-8000  
(212) 752-8393 Facsimile

*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)

**FIFTH 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**

TO: THE HONORABLE LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE

Anthony M. Saccullo, in his capacity as Liquidating Trustee for the TEUM Liquidating Trust (the “Trustee”) hereby moves (the “Motion”), pursuant to section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), and Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order substantially in the form attached hereto as Exhibit A (the “Proposed Order”) extending the Claims

---

<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.



Objection Deadline (defined below) to October 16, 2025. In support of the Motion, the Trustee respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider the Motion under 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. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief requested herein is section 105(a) of the Bankruptcy Code. Such relief also is warranted under Bankruptcy Rule 9006(b)(1).

### **BACKGROUND**

#### **A. The Chapter 11 Cases**

4. On May 15, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code [Docket No. 1]<sup>2</sup> (the “Chapter 11 Cases”).

5. On May 16, 2022, the Debtors filed a motion for approval of bidding procedures and for a sale of substantially all of their assets. [Docket No. 13].

6. On May 24, 2022, the Office of the United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”). [Docket No. 52].

7. On June 30, 2022, the Court approved a sale of substantially all of the Debtors’ assets [Docket No. 167], which closed on July 11, 2022. [Docket No. 212].

8. On July 8, 2022, the Court approved a global settlement among the Debtors, the Committee and proposed purchaser of the Debtors’ assets (the “Global Settlement”). [Docket No.

---

<sup>2</sup> All citations to the docket refer to the jointly administered Chapter 11 Cases, *In re Pareteum Corporation, et al.* Case No. 22-10615 (LGB).

201]. Pursuant to the Global Settlement, the parties agreed to establish the Liquidating Trust as part of a chapter 11 liquidating plan, which would be funded by contributions from the proposed purchasers. The Global Settlement also provided that, subject to certain carveouts, the Liquidating Trust would receive certain rights in causes of action belonging to the Debtors' estates.

9. On October 7, 2022, the Court entered an order confirming the Debtors' liquidating chapter 11 plan (the "Plan"). [Docket No. 374]. Consistent with the Global Settlement, the Plan provides for the creation of the Liquidating Trust for the benefit of general unsecured creditors. (Plan, § 5.4). On October 21, 2022, the Plan went effective, and the Liquidating Trust was formed (the "Effective Date"). [Docket No. 397].

10. Pursuant to the Plan, the Trust is responsible for claims reconciliation. (*See* Plan, Art. 5.4 and 6.5).

## **B. The Claims Process**

11. On June 28, 2022, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (together, the "Schedules and Statements"). Among other things, the Schedules and Statements set forth the claims of known creditors against the Debtors as of the Petition Date, based upon the Debtors' books and records.

12. On July 11, 2022, the Court entered the Order Establishing Bar Dates for Filing Proofs of Claim and the Approving the Form and Manner of Notice Thereof [Docket No. 207] (the "Bar Date Order"), which established, inter alia, August 22, 2022 at 5:00 p.m. (ET) as the deadline for all persons and entities, other than governmental units, to file prepetition proofs of claim against the Debtors, including claims pursuant to section 503(b)(9) of the Bankruptcy Code. The Bar Date Order also established November 11, 2022 at 5:00 p.m. (ET) as the deadline for governmental units to file prepetition proofs of claim against the Debtors.

13. Pursuant to Articles 1.26 and 7.2 of the Plan, objections to Claims were to be filed no later than 180 days after the Effective Date (*i.e.* April 19, 2023), or “as may be specifically fixed by the Plan, the Confirmation Order, the Bankruptcy Rules, or a Final Order.” (*See* Plan, Art. 1.26 and 7.2) (the “Claims Objection Deadline”).

14. The Plan also provides “the Claims Objection Deadline may be extended one or more times by the Bankruptcy Court upon the filing of a notice by the Debtors or the Liquidating Trustee, as applicable.” (*See* Plan, Art. 1.26 and 7.2).

15. Pursuant to the Confirmation Order, the deadline for filing administrative expense claims expired on November 23, 2022 (30 days after notice of occurrence of the Effective Date). (*See* Plan, Art. 2.1).

16. On April 24, 2023, the Court entered an order extending the Claims Objection Deadline through and including October 16, 2023, without prejudice to the rights of the Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline. [Docket No. 490].

17. On October 17, 2023, the Court entered a second order extending the Claims Objection Deadline through and including April 16, 2024, without prejudice to the rights of the Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline. [Docket No. 540].

18. On June 14, 2024, the Court entered a third order extending the Claims Objection Deadline through and including October 16, 2024, without prejudice to the rights of the Trustee or

any other party in interest to seek further extensions of the Claims Objection Deadline. [Docket No. 565].<sup>3</sup>

19. On October 21, 2024, the Court entered a fourth order extending the Claims Objection Deadline 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. [Docket No. 590].

20. On September 16, 2022, the Debtors filed their First Omnibus Objection to Claims of Certain Equity Securities Holders seeking to reclassify Claim Nos. 26, 72, 77, 91, 112, 127, 128, 131, 133, 135 (the “First Omnibus Objection”). [Docket No. 336]. All claims subject to the First Omnibus Objection have been resolved. [Docket Nos. 399, 442, 461, 525].

21. On September 16, 2022, the Debtors filed an Objection to Claims of Robert H. Turner [Claim Nos. 81 and 129] [Docket No. 337]. Pursuant to a stipulation filed on September 22, 2023, the Trustee and Mr. Turner have stipulated to the withdrawal, without prejudice, of this objection. [Docket No. 526].

22. The Trustee has also resolved all objections to the Debtors’ Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 77].

23. Since the Effective Date, the Trustee has made significant progress with respect to the reconciliation of the Administrative Expense, Priority, and Secured Claims. As a result of settlements reached by the Trustee, several Administrative Expense Claims have been resolved.

---

<sup>3</sup> The Trustee, by and through counsel, filed the *Third 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* on March 28, 2024 [Docket No. 552].

24. Although the Trustee expects more Claims to be consensually resolved, he also expects that some of the remaining Claims may be the subject of formal objections. The Trustee intends to work to continue to reconcile the Claims as well as continue to pursue the avoidance actions.

**C. The Avoidance Action**

25. On December 5, 2022, the Trustee filed a complaint commencing an adversary proceeding against Robert H. Turner, Victor Bozzo, Yves Van Sante, Edward O'Donnell, Denis McCarthy, and Robert Mumby. [Adv. Proc. No. 22-01177 (LGB)] (the "D&O Action").

26. On September 28, 2023, certain of the defendants were arrested and charged with securities fraud, conspiracy to commit securities fraud, false SEC filings, and improperly influencing the conduct of audits. *See* Indictment, *U.S. v. Bozzo and O'Donnell*, 23 Cr. 499 (S.D.N.Y. Sept. 28, 2023), attached as Exhibit A to Declaration of Tracy A. Burnett. [Adv. Proc. Docket No. 45]. On that same day, the Securities and Exchange Commission (the "SEC") filed a parallel lawsuit against Messrs. O'Donnell and Bozzo asserting several claims based on the same underlying factual allegations as those in the criminal case and the D&O Action. *SEC. v. O'Donnell*, No. 1:23-cv-08543, Dkt. No. 1 (S.D.N.Y. Sept. 28, 2023).

27. On October 25, 2023, the Court so-ordered a stipulation staying the D&O Action pending resolution of these governmental actions and investigations. [Adv. Proc. No. 22-01177, Adv. Docket No. 55].

28. On October 11, 2024, the SEC entered an administrative order determining that certain executives of Debtor Pareteum Corporation ("Pareteum") engaged in a fraudulent scheme to improperly recognize revenue, leading to Pareteum overstating its revenue by \$12 million for fiscal year 2018 and by \$27 million for the first and second quarters of 2019 combined in its financial statements filed with the SEC (the "SEC Order"). The SEC Order found that Robert H.

Turner was aware of signs that the revenue was being improperly recognized, but he did not take reasonable steps to determine if that was the case prior to signing these financial statements as Pareteum's Chief Executive Officer.

29. Without admitting or denying the SEC's findings, Mr. Turner consented to the SEC Order finding that he violated the antifraud provisions of Section 17(a)(2) and (3) of the Securities Act of 1933, and Section 304 of the Sarbanes-Oxley Act of 2002 ("SOX"). The SEC Order requires Mr. Turner to cease and desist from further violations of the charged provisions and to pay a \$75,000 penalty. The SEC Order also requires, under Section 304 of SOX, that Mr. Turner reimburse Pareteum or its successor in interest \$267,118 that he received as bonus payments (the "Reimbursement Payment").

30. The SEC Order requires payment in full of the Reimbursement Payment within 365 days of its entry in the following installments: (1) a payment of \$50,000 within 60 days of entry; (2) a payment of \$50,000 within 90 days of entry; (3) a payment of \$50,000 within 180 days of entry; and (4) a payment of \$117,118 due within 365 days of entry. To date, the Trust has received payments totaling \$100,000.

31. The Trust was not funded with assets sufficient to pay Administrative Expense Claims in full and there is no certainty that the Trust will have assets sufficient to make a distribution on account of unsecured claims. The Trustee intends to resume prosecution of the D&O Action once these governmental actions and investigations have concluded. Any distribution on account of general unsecured claims claim will depend on the outcome of the D&O Action.

32. On February 3, 2025, the Trustee filed a status report concerning the administration of the Trust. [Docket No. 601].

33. Accordingly, the Trustee seeks to extend the Claims Objection Deadline to avoid (i) what may be an unnecessary use of the Trust's limited remaining resources on objections to

claims for which there ultimately may be no distribution, and (ii) requiring creditors to defend objections to claims on account of which there ultimately may be no distribution.

### **RELIEF REQUESTED**

34. By the Motion, the Trustee requests an extension of the Claims Objection Deadline through and including October 16, 2025 (*i.e.*, 183 days from the current deadline) without prejudice to the rights of the Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.

### **BASIS FOR RELIEF**

35. Section 105(a) of the Bankruptcy Code provides, in pertinent part, that the Court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions [of the Bankruptcy Code].” 11 U.S.C. § 105(a).

36. Bankruptcy Rule 9006(b)(1) provides that a court may “with or without motion or notice order [a] period enlarged if the request therefore is made before the expiration of the period originally prescribed or as extended by a previous order.” Fed. R. Bankr. P. 9006(b)(1).

37. Furthermore, pursuant to the terms of the Plan, the Claims Objection Deadline may be extended upon a notice to the Court. (*See* Plan, Art. 1.26 and 7.2).

38. Courts should be liberal in granting extensions of time sought before the period to act has elapsed, so long as the moving party has not been guilty of negligence or bad faith and the privilege of extension has not been abused. 10 Collier on Bankruptcy ¶ 9006.06[2] (16th ed. rev. 2018). Courts in this District have granted similar applications to extend a debtor’s time to object to claims in other large chapter 11 cases. *See, e.g., In re SunEdison, Inc.*, Case No. 16-10992 (DSJ) (granting multiple extensions of claims objection deadlines); *In re Relativity Fashion, LLC*, Case No. 15-11989 (MEW) (same); *In re BGI, INC., f/k/a Borders Group, Inc.*, Case No. 11-10614 (MG) (same); *In re Loehmann’s Holdings, Inc.*, et al., Case No. 10-16077 (REG) (same).



39. The proofs of claim that have been filed in these cases total approximately \$42,057,937.84. Since the Effective Date, the Trustee and his professionals have worked to, among other things, review and analyze the proofs of claim and perform the required due diligence to identify any objectionable claims. As of the date hereof, the Trustee has resolved all pending Administrative Expense Claims. However, the Trustee needs additional time to fully reconcile the remaining Claims, prepare objections thereto, if necessary, or consensually resolve such claims, if appropriate, given the Trust's limited assets and the pending D&O Action.

40. Such extension will provide the Trustee and other parties in interest with additional time to reconcile claims, to prepare appropriate claim objections, if necessary, and to negotiate with holders of claims to resolve any objections. Extending the Claims Objection Deadline as set forth herein is not sought for purposes of delay and will not prejudice any claimant, as each claimant will retain any substantive defenses it may have to any claims objections that are filed. Accordingly, the Trustee respectfully requests entry of an order granting the Motion and extending the Claims Objection Deadline through and including October 16, 2025.

### **NOTICE**

41. Notice of this Motion will be given to: (i) the U.S. Trustee; and (ii) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Trustee submits that, under the circumstances, no other or further notice is required.

### **PRIOR REQUEST**

42. This is the fifth request for an extension of the Claims Objection Deadline that has been filed in these Chapter 11 Cases.

**CONCLUSION**

WHEREFORE, the Trustee respectfully requests that the Court enter an order substantially in the form attached hereto approving the Motion and granting such other and further relief as the Court deems appropriate under the circumstances.

DATED: New York, New York  
March 17, 2025

**COLE SCHOTZ P.C.**

By: /s/ Seth Van Aalten

Seth Van Aalten, Esq.  
Cameron A. Welch, Esq.  
Krista L. Kulp, Esq.  
1325 Avenue of the Americas – 19<sup>th</sup> Floor  
New York, New York 10019  
(212) 752-8000  
(212) 752-8393 Facsimile  
Email: svanaalten@coleschotz.com  
cwelch@coleschotz.com  
kkulp@coleschotz.com

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

**COLE SCHOTZ P.C.**

Seth Van Aalten, Esq.  
Cameron A. Welch, Esq.  
Krista L. Kulp, Esq.  
1325 Avenue of the Americas – 19<sup>th</sup> Floor  
New York, New York 10019  
(212) 752-8000  
(212) 752-8393 Facsimile

*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)

**NOTICE OF FIFTH 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**

**PLEASE TAKE NOTICE** that, on March 17, 2025, the *Fifth 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* (the “**Motion**”) was filed with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, and must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User’s Manual for the Electronic Case Filing System may be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court’s case filing system, and by all other parties in interest on a disk, preferably in Portable Document Format (PDF), or any other Windows-based word processing format (with a copy e-mailed directly to Chambers at: ([beckerman.chambers@nysb.uscourts.gov](mailto:beckerman.chambers@nysb.uscourts.gov)), and in accordance with General Order M-399, and any objection must further be served upon: (a) *Counsel to the Debtors*, Togut, Segal

---

<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.

& Segal LLP, One Penn Plaza, Suite 3335, New York, NY 10119, Attn: Frank A. Oswald Esq. ([frankoswald@teamtogut.com](mailto:frankoswald@teamtogut.com)) and Brian F. Moore, Esq. ([bmoore@teamtogut.com](mailto:bmoore@teamtogut.com)); (b) *Office of the U.S. Trustee, Region II*, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Susan Arbeit, Esq. ([susan.arbeit@usdoj.gov](mailto:susan.arbeit@usdoj.gov)) and Annie Wells, Esq. ([annie.wells@usdoj.gov](mailto:annie.wells@usdoj.gov)); (c) *counsel to Anthony M. Saccullo, in his capacity as Liquidating Trustee, for the TEUM Liquidating Trust*, Cole Schotz P.C., 1325 Avenue of the Americas, 19th Floor, New York, NY 10019, Attn: Seth Van Aalten, Esq. ([svanaalten@coleschotz.com](mailto:svanaalten@coleschotz.com)); and 25 Main Street, Court Plaza North, Hackensack, NJ 07602, Attn: Cameron Welch, Esq. ([cwelch@coleschotz.com](mailto:cwelch@coleschotz.com)); and (d) any parties required to be served under any applicable Bankruptcy Rule or Local Rule, so as to be received no later than **March 31, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that, a hearing to consider the Motion is scheduled for **April 10, 2025 at 10:00 a.m. (ET)** (the “**Hearing**”). The Hearing is scheduled for a Zoom hearing before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge for the Southern District of New York, via *Zoom for Government*. Those wishing to appear before the Bankruptcy Court at the Hearing must register their appearance by utilizing the Electronic Appearance portal located at the Bankruptcy Court’s website: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered no later than **April 9, 2025 at 4:00 p.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that unless a written objection to the Motion, with proof of service, is filed with the Bankruptcy Court and a courtesy copy delivered to the Honorable Lisa G. Beckerman’s chambers by the Objection Deadline, the Trustee may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion, which order may be entered with no further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion and related filings can be viewed and/or obtained by (i) accessing the Bankruptcy Court’s Website for a fee, (ii) visiting the website for the Debtors’ chapter 11 cases at <http://www.kccllc.net/pareteum>, or (iii) contacting the Office of the Clerk of the United States Bankruptcy Court, Southern District of New York. Please note that a PACER password is required to access documents on the Bankruptcy Court’s Website.

*[Remainder of page intentionally left blank]*

Dated: New York, New York  
March 17, 2025

**COLE SCHOTZ P.C.**

By: /s/ Seth Van Aalten

Seth Van Aalten, Esq.

Cameron Welch, Esq.

Krista L. Kulp, Esq.

1325 Avenue of the Americas – 19<sup>th</sup> Floor

New York, New York 10019

(212) 752-8000

(212) 752-8393 Facsimile

Email: svanaalten@coleschotz.com

cwelch@coleschotz.com

kkulp@coleschotz.com

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

**EXHIBIT A**

Proposed Order

**COLE SCHOTZ P.C.**

Seth Van Aalten, Esq.  
Cameron A. Welch, Esq.  
Krista L. Kulp, Esq.  
1325 Avenue of the Americas – 19<sup>th</sup> Floor  
New York, New York 10019  
(212) 752-8000  
(212) 752-8393 Facsimile

*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)

**ORDER GRANTING FIFTH 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

---

<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 October 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: \_\_\_\_\_, 2025  
New York, New York

\_\_\_\_\_  
THE HONORABLE LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE



**PROCEDURES FOR ALL HEARINGS BEFORE JUDGE BECKERMAN**  
**BEING HELD BY ZOOM VIDEO**

The Zoom video hearing (the “Hearing”) held in connection with this notice will be conducted in accordance with the procedures contained herein.

With respect to Hearings that are evidentiary hearings or trials, the procedures contained herein are subject to, and do not limit, the terms of any pre-trial order, scheduling order, or other order regarding the Hearings.

These procedures have been modified to comply with the [revised policy](#), effective September 22, 2023, of the Judicial Conference of the United States concerning the public’s remote access to civil and bankruptcy proceedings (the “Revised Policy”). Under the Revised Policy, the press and other public attendees (“Public Attendees”) may only receive audio access to non-evidentiary Hearings when appearing remotely. For evidentiary hearings and trials, Public Attendees may not attend via remote means and should attend in-person in the courtroom. The Revised Policy does not affect the ability of case participants (e.g., parties-in-interest and their attorneys, witnesses, and interpreters) (“Case Participants”) from attending Zoom Hearings using the platform’s videoconferencing features.

All Case Participants and Public Attendees that wish to attend a Zoom Hearing (whether attending remotely or in-person) must register for the Hearing through the Electronic Appearance Portal (“eCourt Appearance Tool”) located on the Court's website (<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>) by the deadlines set forth in Sections 2 and 3 below.

**PROCEDURES**

1. **Audio and Videoconferencing Solutions.** The Hearing shall occur virtually using both audio and videoconferencing solutions as set forth herein. The Court shall utilize Zoom for Government (for audio and video purposes). The Court shall provide the Zoom link to the list of persons registered as Case Participants pursuant to the instructions set forth in Section 2 below and a Zoom dial-in number to Public Attendees who provide notice of their attendance to the Court pursuant to the instructions set forth in Section 3 below.
2. **Hearing Attendance by Case Participants.** All Case Participants must register for the Hearing through the eCourt Appearance Tool by no later than 4:00 p.m. (ET) one business day before the Hearing. Failure to register by the specified deadline will result in the Case Participant not being admitted to the Hearing. The Court will email the Zoom link to registered Case Participants after 4:00 p.m. (ET) one business day before the Hearing. Parties are strictly forbidden from circulating or sharing the Zoom link.
3. **Hearing Attendance by Public Attendees.** All Public Attendees who wish to dial-in to a Hearing where testimony is not expected must register for the Hearing through the eCourt

Appearance Tool by no later than 4:00 p.m. (ET) one business day before the Hearing. Failure to register by the specified deadline will result in the Public Attendee not being admitted to the Hearing. The Court will email the Zoom dial-in information to registered Public Attendees prior to the Hearing. Registered Public Attendees are strictly forbidden from circulating or sharing the Zoom dial-in information. Because Public Attendees cannot dial in to a Hearing where testimony is expected, Public Attendees may attend such a Hearing in person in the courtroom.

4. **Courtroom Formalities.** Although being conducted using audio and videoconferencing on Zoom, the Hearing constitutes a court proceeding, and any recording other than the official court version is prohibited. No participant or attendee of the Hearing may record images or sounds of the Hearing from any location. All parties appearing before the Court must situate themselves in such a manner as to be able to view the video screen and be seen by the Court. For purposes of this Hearing, the parties must observe the formalities of a courtroom.

5. **Submission of Exhibits and Demonstratives to Court.** If any of the parties intend to offer any exhibits at the Hearing or use any demonstratives at the Hearing, such party shall provide the Court (and file on ECF) a copy of the exhibits or demonstratives it will seek to use during the Hearing (either by offering it in evidence or using it for demonstrative purposes) no later than the deadline set forth in Judge Beckerman's Chambers Rules or the applicable scheduling or pre-trial order but in any event at least 24 hours before the Hearing.

6. **Checking in for Hearing.** Because of the Court's security requirements for participating in a Zoom for Government audio and video hearing, all persons seeking to attend the Hearing must connect to the Hearing beginning half an hour before the scheduled start of the Hearing and no later than ten minutes before the Hearing start time. Failure to connect to the Hearing at the indicated time may result in significant delays to the start of the Hearing. When signing into Zoom for Government, participants must type in the first and last name that will be used to identify them at the hearing, and the party they represent (i.e., Jane Doe, Debtor's Counsel). Participants who type only their first name, a nickname, or initials will not be admitted into the hearing. When seeking to connect for video participation in a Zoom for Government hearing, participants will first enter a waiting room in the order in which the participants seek to connect. Court personnel will admit each person to the Hearing from the waiting room after confirming the person's name (and telephone number, if a telephone is used to connect) provided to the Court in accordance with Sections 2 and 3 above. You may experience a delay in the waiting room before you are admitted to the Hearing. Once admitted, please turn off your video and mute the microphone on Zoom until the Court calls your matter.

7. **Retention of Jurisdiction.** The Court retains jurisdiction with respect to all matters arising from or related to these procedures.

**COLE SCHOTZ P.C.**

1325 Avenue of the Americas, 19<sup>th</sup> Floor  
New York, NY 10019

Telephone: (212) 752-8000

Facsimile: (212) 752-8393

Seth Van Aalten, Esq.

Cameron Welch, Esq.

Krista L. Kulp, Esq.

Email: svanaalten@coleschotz.com

cwelch@coleschotz.com

kkulp@coleschotz.com

*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.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-10615 (LGB)

(Jointly Administered)

**CERTIFICATION OF SERVICE**

On March 17, 2025, the *Fifth 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* (the “Motion”) was electronically filed with the Court, using the Court’s electronic filing system, and served via (i) the Court’s CM/ECF system on the parties that have consented to electronic service of all filings and (ii) electronic mail on the parties listed on the attached service list.

<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, NY 10036.

Also, on March 17, 2025, pursuant to Judge Lisa G. Beckerman's chambers' rules, a courtesy copy of the Motion was sent, via overnight delivery, to The Honorable Lisa G. Beckerman, U.S. Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408.

DATED: March 17, 2025

**COLE SCHOTZ P.C.**

By: /s/ Seth Van Aalten  
Seth Van Aalten, Esq.  
1325 Avenue of the Americas – 19<sup>th</sup> Floor  
New York, New York 10019  
(212) 752-8000  
(212) 752-8393 Facsimile  
Email: svanaalten@coleschotz.com

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

**SERVICE LIST**

Alabama Attorney General  
Attn Bankruptcy Department  
501 Washington Ave  
PO Box 300152  
Montgomery, AL 36104-0152

Alaska Attorney General  
Attn Bankruptcy Department  
1031 West 4th Avenue, Suite 200  
Anchorage, AK 99501-1994

Arizona Attorney General  
Attn Bankruptcy Department  
2005 N Central Ave  
Phoenix, AZ 85004-2926

Arkansas Attorney General  
Attn Bankruptcy Department  
323 Center St. Ste 200  
Little Rock, AR 72201-2610

Brian J. Lohan, Esq.  
Arnold & Porter Kaye Scholer LLP  
70 West Madison Street, Suite 4200  
Chicago, IL 60602

AT&T Mobility  
Attn James Walter Grudus, Assistant Vice  
President  
1 Rockefeller Plaza, Room 18-19  
New York, NY 10020

Jorian L. Rose, Esq.  
Michael A. Sabella, Esq.  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111

Michael J. Barrie, Esq.  
Kevin M. Capuzzi, Esq.  
Benesch, Friedlander, Coplan & Aronoff LLP  
1313 N. Market Street, Suite 1201  
Wilmington, DE 19801

Shawn M. Christianson, Esq.  
Buchalter, a Professional Corporation  
425 Market St., Suite 2900  
San Francisco, CA 94105

California Attorney General  
Attn Bankruptcy Department  
1300 I St., Ste. 1740  
Sacramento, CA 95814-2919

Colorado Attorney General  
Attn Bankruptcy Department  
Ralph L Carr Colorado Judicial Building  
1300 Broadway, 10th Fl  
Denver, CO 80203

Connecticut Attorney General  
Attn Bankruptcy Department  
165 Capitol Avenue  
Hartford, CT 06106

Dawson James Securities, Inc.  
c/o ArentFox Schiff LLP  
Attn Steven Wilamowsky  
1185 Avenue of the Americas  
New York, NY 10036

Delaware Attorney General  
Attn Bankruptcy Department  
Carvel State Office Bldg.  
820 N. French St.  
Wilmington, DE 19801

District of Columbia Attorney General  
Attn Bankruptcy Department  
400 6th Street NW  
Washington, D.C. 20001

Jamila Justine Willis, Esq.  
Shmuel Klahr, Esq.  
Gregory Juell, Esq.  
DLA Piper LLP (US)  
1251 Avenue of the Americas  
New York, NY 10020-1104

Nadia B. Saleem, Esq.  
DLA Piper LLP (US)  
1201 West Peachtree Street, Suite 2900  
Atlanta, GA 30309-3449

Amish R. Doshi, Esq.  
Doshi Legal Group, P.C.  
1979 Marcus Avenue, Suite 210E  
Lake Success, Ny 11042

Florida Attorney General  
Attn Bankruptcy Department  
The Capitol PL-01  
Tallahassee, FL 32399-1050

Peter B. Foster, Esq.  
Foster & Wolkind, P.C.  
80 Fifth Avenue, Suite 1401  
New York, NY 10011

Georgia Attorney General  
Attn Bankruptcy Department  
40 Capital Square, SW  
Atlanta, GA 30334-1300

Hawaii Attorney General  
Attn Bankruptcy Department  
425 Queen Street  
Honolulu, HI 96813

Christopher R. Donoho III, Esq.  
Sara Posner, Esq.  
Hogan Lovells US LLP  
390 Madison Ave  
New York, NY 10017

Idaho Attorney General  
Attn Bankruptcy Department  
700 W. Jefferson Street Suite 210  
PO Box 83720  
Boise, ID 83720-0010

Illinois Attorney General  
Attn Bankruptcy Department  
James R. Thompson Ctr  
100 W. Randolph St.  
Chicago, IL 60601

Indiana Attorney General  
Attn Bankruptcy Department  
Indiana Govt Center South  
302 West Washington St 5th Fl  
Indianapolis, IN 46204

Iowa Attorney General  
Attn Bankruptcy Department  
Hoover State Office Bldg  
1305 E. Walnut Street  
Des Moines, IA 50319

Kim E. Miller, Esq.  
Kahn Swick & Foti, LLC  
250 Park Avenue, 7th Floor  
New York, NY 10177

Kansas Attorney General  
Attn Bankruptcy Department  
120 SW 10th Ave., 2nd Fl  
Topeka, KS 66612-1597

Kentucky Attorney General  
Attn Bankruptcy Department  
700 Capitol Avenue  
Capitol Building, Suite 118  
Frankfort, KY 40601-3449

Michael R. Handler, Esq.  
King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036

Thaddeus D. Wilson, Esq.  
King & Spalding LLP  
1180 Peachtree Street N.E., Suite 1600  
Atlanta, GA 30309-3521

Jeremy S. Williams, Esq.  
Adolyn C. Wyatt, Esq.  
Kutak Rock LLP  
901 East Byrd Street, Suite 1000  
Richmond, VA 23219

Lexence  
Amstelveenseweg 500  
Amsterdam 1081 KL  
Netherlands

Louisiana Attorney General  
Attn Bankruptcy Department  
1885 North Third Street  
Baton Rouge, LA 70802

Michael S. Etkin, Esq.  
Lowenstein Sandler LLP  
One Lowenstein Drive  
Roseland, NJ 07068

Maine Attorney General  
Attn Bankruptcy Department  
6 State House Station  
Augusta, ME 04333

Maryland Attorney General  
Attn Bankruptcy Department  
200 St. Paul Place  
Baltimore, MD 21202-2202

Massachusetts Attorney General  
Attn Bankruptcy Department  
One Ashburton Place, 20th Floor  
Boston, MA 02108-1518

Michigan Attorney General  
Attn Bankruptcy Department  
G. Mennen Williams Building  
525 W. Ottawa St.  
P.O. Box 30212  
Lansing, MI 48909

Minnesota Attorney General  
Attn Bankruptcy Department  
445 Minnesota St Suite 1400  
St. Paul, MN 55101-2131

Mississippi Attorney General  
Attn Bankruptcy Department  
Walter Sillers Building  
550 High St Ste 1200  
Jackson, MS 39201

Missouri Attorney General  
Attn Bankruptcy Department  
Supreme Court Bldg.  
207 W. High St.  
P.O. Box 899  
Jefferson City, MO 65102

Missouri Department of Revenue, Bankruptcy  
Unit  
Attn Steven A. Ginther  
PO Box 475  
Jefferson City, MO 65105-0475

Montana Attorney General  
Attn Bankruptcy Department  
Justice Bldg.  
215 N. Sanders 3rd Fl  
Helena, MT 59620-1401

David M. Banker, Esq.  
Maura I. Russell, Esq.  
Montgomery McCracken Walker & Rhoads LLP  
437 Madison Avenue, 24th Floor  
New York, NY 10022

Nebraska Attorney General  
Attn Bankruptcy Department  
2115 State Capitol  
P.O. Box 98920  
Lincoln, NE 68509

Nevada Attorney General  
Attn Bankruptcy Department  
Old Supreme Ct. Bldg.  
100 N. Carson St  
Carson City, NV 89701

New Hampshire Attorney General  
Attn Bankruptcy Department  
33 Capitol St.  
Concord, NH 03301

New Jersey Attorney General  
Attn Bankruptcy Department  
Richard J. Hughes Justice Complex  
25 Market St  
PO Box 080  
Trenton, NJ 08625-0080

New Mexico Attorney General  
Attn Bankruptcy Department  
408 Galisteo St  
Villagra Building  
Santa Fe, NM 87501

North Dakota Attorney General  
Attn Bankruptcy Department  
600 E. Boulevard Ave.  
Dept 125  
Bismarck, ND 58505-0040

Andrew Rosenblatt  
Norton Rose Fulbright US LLP  
1301 Avenue of the Americas  
New York, NY 10019-6022

Office of the United States Trustee for Region 2  
Attn Annie Wells  
201 Varick Street Suite 1006  
US Federal Office Building  
New York, NY 10014

Office of the United States Trustee for Region 2  
Attn Susan Arbeit  
201 Varick Street Suite 1006  
US Federal Office Building  
New York, NY 10014

Ohio Attorney General  
Attn Bankruptcy Department  
30 E. Broad St. 14th Fl  
Columbus, OH 43215-0410

Ohio Attorney General  
Robert L. Doty, Assistant Attorney General  
Collections Enforcement  
Toledo Regional Office  
One Government Center, Suite 1340  
Toledo, OH 43604-2261

Oklahoma Attorney General  
Attn Bankruptcy Department  
313 NE 21st St  
Oklahoma City, OK 73105

Oregon Attorney General  
Attn Bankruptcy Department  
1162 Court St. NE  
Salem, OR 97301-4096

Pareteum  
Attn: Laura W. Thomas, Interim CFO  
Alexander Korff, Corporate Secretary  
1185 Avenue of the Americas, 20th Floor  
New York, NY 10036

David W. Dykhouse, Esq.  
Kimberly Black, Esq.  
Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036-6710

Pennsylvania Attorney General  
Attn Bankruptcy Department  
16th Floor, Strawberry Square  
Harrisburg, PA 17120

Nicholas A. Pasalides, Esq.  
Reich Reich & Reich, P.C.  
235 Main Street, Suite 450  
White Plains, NY 10601

Rhode Island Attorney General  
Attn Bankruptcy Department  
150 S. Main St.  
Providence, RI 02903

Matthew M. Roose, Esq.  
Daniel G. Egan, Esq.  
Ropes & Gray LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704

Securities & Exchange Commission  
NY Regional Office  
Regional Director  
100 Pearl St., Suite 20-100  
New York, NY 10004-2616

Securities and Exchange Commission  
Attn General Counsel  
100 F St NE  
Washington, D.C. 20549

Matthew A. Clemente, Esq.  
Sidley Austin LLP  
1 S Dearborn St  
Chicago, IL 60603

Maegan Quejada, Esq.  
Sidley Austin LLP  
1000 Louisiana St., Suite 5900  
Houston, TX 77002

Michael G. Burke, Esq.  
Michael A. Sabino, Esq.  
Sidley Austin LLP  
787 7th Ave  
New York, NY 10019

South Carolina Attorney General  
Attn Bankruptcy Department  
Rembert C. Dennis Office Bldg.  
1000 Assembly St Room 519  
Columbia, SC 29201



South Dakota Attorney General  
Attn Bankruptcy Department  
1302 East Highway 14, Suite 1  
Pierre, SD 57501-8501

Christopher J. Giaimo, Esq.  
Squire Patton Boggs (US) LLP  
2550 M Street, NW  
Washington, D.C. 20037

Juandisha Harris, Assistant Attorney General  
State of Michigan, Department of Treasury  
3030 W. Grand Blvd., Ste. 10-200  
Cadillac Place Building  
Detroit, MI 48202

Tennessee Attorney General  
Attn Bankruptcy Department  
425 5th Avenue North  
Nashville, TN 37243

Texas Attorney General  
Attn Bankruptcy Department  
300 W. 15th St  
Austin, TX 78701

TN Dept of Revenue  
c/o TN Attorney General's Office, Bankruptcy  
Division  
PO Box 20207  
Nashville, TN 37202-0207

Frank A. Oswald, Esq.  
Brian Moore, Esq.  
Togut, Segal & Segal LLP  
One Penn Plaza Suite 3335  
New York, NY 10119

Utah Attorney General  
Attn Bankruptcy Department  
Utah State Capitol Complex  
350 North State Street, Suite 230  
Salt Lake City, UT 84114-2320

Vermont Attorney General  
Attn Bankruptcy Department  
109 State St.  
Montpelier, VT 05609-1001

Virginia Attorney General  
Attn Bankruptcy Department  
202 North Ninth St  
Richmond, VA 23219

Washington Attorney General  
Attn Bankruptcy Department  
1125 Washington St SE  
PO Box 40100  
Olympia, WA 98504-0100

West Virginia Attorney General  
Attn Bankruptcy Department  
State Capitol Bldg., 1 Rm E-26  
1900 Kanawha Blvd., East  
Charleston, WV 25305

Wisconsin Attorney General  
Attn Bankruptcy Department  
Wisconsin Dept. of Justice  
114 East, State Capitol  
PO Box 7857  
Madison, WI 53707-7857

Wyoming Attorney General  
Attn Bankruptcy Department  
109 State Capitol  
Cheyenne, WY 82002

Keith Moore, Kevin Ivkovich, Lead Plaintiff, On  
Behalf of Itself and the Proposed Class in the In  
re: Pareteum Securities Litigation, Nicholas  
Steffey, Robert Whitley and Stephen Jones  
c/o Michael Etkin and Nicole Fulfree  
Lowenstein Sandler LLP  
One Lowenstein Drive  
Roseland, NJ 07068

Keith Moore, Kevin Ivkovich, Lead Plaintiff, On  
Behalf of Itself and the Proposed Class in the In  
re: Pareteum Securities Litigation, Nicholas  
Steffey, Robert Whitley and Stephen Jones  
c/o Lewis S. Kahn, Esq.  
Melinda A. Nicholson, Esq.  
Michael J. Palestina, Esq.  
Melissa H. Harris, Esq.  
Matthew Woodard, Esq.  
Kahn Swick and Foti, LLC  
1100 Poydras St., Suite 3200  
New Orleans, LA 70163

Dane Gasio  
c/o Jeremy S. Williams, Esq.  
Kutak Rock LLP  
901 East Byrd Street, Suite 1000  
Richmond, VA 23219-4071

Sabby Volatility Warrant Master Fund, Ltd.  
c/o Matthew M. Roose, Esq.  
Daniel J. Egan, Esq.  
Ropes & Gray LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704

Sabby Volatility Warrant Master Fund, Ltd.  
Attn Robert A. Grundstein, COO  
10 Mountainview Road, Suite 205  
Upper Saddle River, NJ 07458

Robert H. Turner  
c/o Marianna Udem, Esq.  
ASK LLP  
60 East 42nd Street, 46th Floor  
New York, NY 10165

Robert H. Turner  
c/o Michael A. Sabella, Esq.  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111