

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

In re:

Thinkstream Incorporated of
Delaware f/k/a Thinkstream,
Incorporated of Colorado,

Alleged Debtor.

Case No. 15-10553

Chapter
11(Involuntary)

Judge Douglas D.Dodd

REPLY TO OPPOSITIONS TO MOTION FOR EXTENSION OF
TIME TO FILE PLEADINGS

The defendant Thinkstream Incorporated of Delaware (Thinkstream), through undersigned counsel, responds to the opposition filed by the Plaintiffs herein as follows:

1. The statement that “There has been no previous extension of time to plead, and the opposing parties have not filed into the record an objection to extension of time” is a direct quotation from District Rule 7(a). This language was utilized for the court’s information and carries no inferences that other parties may or do not object. Counsel recognizes that reference to the rule was misstated and that the continuance is at the discretion of the Court.
2. The objections filed by the plaintiffs offers no substantive reasons for the objection. TSB counsel is aware that Thinkstream counsel has requested and not received evidence regarding both the authenticity and enforceability of the debentures that TSB was to provide.
3. Evidence necessary to a determination of the debentures’ enforceability has been requested of and not yet provided by Commonwealth Advisors, Inc., which

purportedly sold the debentures in question to TSB on December 28, 2007, despite repeated requests. Further, TSB has attached an *unexecuted* debenture to its petition showing no holder, and has since its filing shown Thinkstream twelve debentures that do not show TSB as the holder. Undersigned counsel has met with TSB counsel about these matters and is attempting to resolve threshold issues before filing a responsive pleading. To date TSB has not responded to Thinkstream's request for supporting documentation to show what Commonwealth Advisors or its clients received in return for the debentures.

4. This information is of particular significance because the original debenture holders in this matter, who in fact themselves paid Thinkstream for the debentures, may be the true creditors of Thinkstream. Many of these original debenture holders are clients of Commonwealth Advisors Inc. and victims of the alleged scheme described in 3:12-cv-00700, Middle District of Louisiana, *Securities and Exchange Commission v. Commonwealth Advisors Inc. et al.*, and upon information and belief, that scheme was compounded by the transfer of these debentures to TSB.
5. Under the above-stated circumstances, Thinkstream does not understand the Plaintiff's objection and urges the Court to grant the extension. The extension will serve judicial efficiency in that is for the purpose of documenting information that is basic to a response, and not for delay.

Respectfully submitted,

s/ Edward J Gonzales III

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