## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)	
EVERYCALL COMMUNICATIONS, INC. D/B/A LOCAL USA D/B/A ALL AMERICAN HOME	)	DOCKET NO. 09-00003
PHONE APPLICATION FOR DESIGNATION AS	)	09-00003
AN ELIGIBLE TELECOMMUNICATIONS CARRIER	)	
CHULER	,	

## **MOTION FOR STAY**

Everycall Communications, Inc. ("Everycall") hereby moves the Tennessee

Regulatory Authority ("Authority") for a stay of the proceedings in this case. As grounds
for its motion, Everycall states the following:

- 1. On July 12, 2010, Everycall filed a voluntary petition for bankruptcy under Chapter 11 of Title 11, United States Bankruptcy Court for the Middle District of Louisiana. Notice of Bankruptcy filing is attached.
- 2. A stay of certain actions under 11 U.S.C. § 362(a) may prohibit Everycall and the Authority from proceeding with the administrative case.
- 3. Even if the Authority action is not prohibited, a stay is necessary to determine the status of Everycall after the termination of the bankruptcy proceeding.
- 4. A stay is in the interests of judicial economy and efficiency since, among other factors, there is no necessity for designation as an Eligible Telecommunications Carrier until Everycall's post-bankruptcy status is determined.

WHEREFORE, Everycall respectfully requests that its Motion be granted.

Respectfully submitted this 22<sup>nd</sup> day of September, 2010 by:

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Counsel for Everycall Communications, Inc.

## United States Bankruptcy Court Middle District of Louisiana

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 07/12/2010 at 1:01 PM and filed on 07/12/2010.

EveryCall Communications, Inc. 4315 Bluebonnet Blvd., Ste. A Baton Rouge, LA 70809
Tax ID / EIN: 72-1403495
dba
All American Home Phone
dba

Local USA



The case was filed by the debtor's attorney:

Brandon A. Brown Stewart Robbins & Brown, LLC 247 Florida Street P.O. Box 66498 Baton Rouge, LA 70896 225-231-9998

The case was assigned case number 10-11054.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page http://ecf.lamb.uscourts.gov/ or at the Clerk's Office, 707 Florida Street Room 119 Baton Rouge, LA 70801.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Monica M. Menier Clerk, U.S. Bankruptcy Court

	Transaction	1 Receipt	-
	07/12/2010	13:03:29	<del></del>
PACER Login:	sh3619	Client Code:	
Description:	Notice of Filing	Search Criteria:	10-11054
Billable Pages:	11	Cost:	0.08