

HEARING DATE: August 6, 2015
HEARING TIME: 2:00 p.m.

TARTER KRINSKY & DROGIN LLP
1350 Broadway, 11th Floor
New York, New York 10018
(212) 216-8000
Rocco A. Cavaliere, Esq.

*Attorneys for Marcatel Com, S.A. de C.V.,
Gusma Properties, LP, Gusma Investment, LP,
Progress International, LLC, Unifica Contact
Media S.A. de C.V. and the Debtors' Directors*

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
VIVARO CORPORATION, et al. : Case No.: 12-13810 (MG)
: :
Debtor. : (Jointly Administered)
----- X

NOTICE OF MOTION FOR AN ORDER CONVERTING THE DEBTORS' CHAPTER 11 BANKRUPTCY CASES TO CHAPTER 7 OF THE BANKRUPTCY CODE

PLEASE TAKE NOTICE, that upon the motion (the "Motion") dated July 13, 2015, Marcatel Com, S.A. de C.V., Gusma Properties, LP, Gusma Investment, LP, Progress International, LLC, Unifica Contact Media S.A. de C.V. and the Debtors' Directors (collectively, the "Movants"), shall move before the Honorable Martin Glenn, United States Bankruptcy Judge, in his courtroom at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004, on August 6, 2015 at 2:00 p.m. or as soon thereafter as counsel may be heard, for an Order converting these chapter 11 cases to ones under chapter 7 of the Bankruptcy Code, and for such other and further relief as this Court deems just and proper.

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PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the

Motion shall be (i) filed with the Clerk of the Bankruptcy Court on the Court's ECF system; and served upon (ii) Tarter Krinsky & Drogin LLP, 1350 Broadway, 11th Floor, New York, New York 10018, Attn: Rocco Cavaliere, Esq. and (iii) delivered to the chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, so that same are received on or before **5:00 p.m. on July 30, 2015.**

Dated: New York, New York
July 13, 2015

TARTER KRINSKY & DROGIN LLP
*Attorneys for Marcatel Com, S.A. de C.V.,
Gusma Properties, LP, Gusma Investment, LP,
Progress International, LLC, Unifica Contact
Media S.A. de C.V. and the Debtors' Directors*

By: /s/Rocco A. Cavaliere
Rocco A. Cavaliere
1350 Broadway, 11th Floor
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