

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

TARTER KRINSKY & DROGIN LLP  
1350 Broadway, 11<sup>th</sup> 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

----- X  
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.

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, 11<sup>th</sup> 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

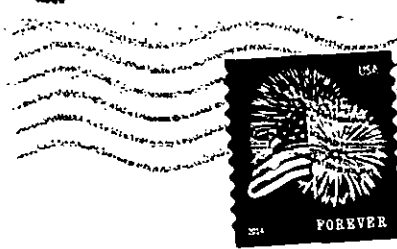
**TARTER KRINSKY & DROGIN LLP**  
*Attorneys for Marcatel Com, S.A. de C.V.,  
Gusma Properties, LP, Gusma Investment, LP,  
Progress International, LLC, Unifica Contact  
Media S.A. de C.V. and the Debtors' Directors*

By: /s/Rocco A. Cavaliere  
Rocco A. Cavaliere  
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New York, New York 10018  
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RETURN ADDRESS:

Tarter Krinsky & Drogin LLP  
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