

THE PROPOSED FORM AND SCOPE OF NOTICE ARE HEREBY APPROVED, SUCH NOTICE TO INCLUDE SERVICE OF THE MOTION AND STIPULATION AND NOTICE OF THE HEARING AND OBJECTION DEADLINE ON THE 20 LARGEST NON-INSIDER UNSECURED CREDITORS.

*Charles D. Kest*  
Dated: 10/12/2022

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

In re:  
  
TELEXFREE, LLC,  
TELEXFREE, INC. and  
TELEXFREE FINANCIAL, INC.,  
  
Debtors.  
  
STEPHEN DARR, LIQUIDATING TRUSTEE  
OF THE CHAPTER 11 ESTATES OF EACH  
OF THE DEBTORS,  
  
Plaintiff,  
  
v.  
  
CARLOS WANZELER, et al  
Defendants.

Chapter 11 Cases

14-40987-MSH

14-40988-MSH

14-40989-MSH

Substantively Consolidated

Adversary Proceeding

No. 16-4032

**MOTION TO APPROVE FORM AND SCOPE OF NOTICE WITH RESPECT TO  
MOTION BY TRUSTEE TO APPROVE STIPULATION OF SETTLEMENT  
BETWEEN TRUSTEE AND JAMES MERRILL**

Stephen Darr, the Liquidating Trustee under the confirmed liquidating plan of reorganization, and formerly the Chapter 11 trustee (the "Trustee") of the substantively consolidated bankruptcy estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors" or "TelexFree"), respectfully requests that the Court approve the the form and scope of notice in connection with the attached stipulation ("Stipulation") by and between the Trustee and James Merrill ("Merrill"), a defendant in this adversary proceeding. In support of this motion, the Trustee states as follows:

