

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

TELEXFREE, LLC,
TELEXFREE, INC.,
TELEXFREE FINANCIAL, INC.,

Reorganized Debtors.

Chapter 11

Case No. 14-40987-MSH

Case No. 14-40988-MSH

Case No. 14-40989-MSH

Substantively Consolidated

JOINT MOTION TO CONTINUE HEARING ON OBJECTIONS TO
CERTAIN CLAIMS

Stephen B. Darr, the duly appointed Liquidating Trustee (the "Liquidating Trustee") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Reorganized Debtors" or "TelexFree") and the claimants represented by Shapiro & Hender (the "Shapiro Claimants") respectfully request that the Court continue the hearing presently scheduled for November 4, 2022 at 10:00 a.m. with respect to the following objections to certain claims: (i) Second Omnibus Objection to Claims [docket 2226]; (ii) Third Omnibus Objection to Claims [docket 2227]; (iii) Sixth Omnibus Objection to Claims [docket 2899]; and (iv) Seventh Omnibus Objection to Claims [docket 2900].

Background

1. On July 8, 2020, the Court held a hearing on the First Amended Liquidating Plan of Reorganization (the "Plan") of Stephen Darr, the Chapter 11 Trustee (the "Chapter 11 Trustee") of TelexFree.

2. On July 9, 2020, the Court entered an order confirming the Plan (the "Plan Order", docket no. 3432).



3. The Plan became effective on July 14, 2020 (the “Effective Date”). Upon the Effective Date, Mr. Darr was appointed Liquidating Trustee to implement the terms of the confirmed Plan.

4. The Trustee had previously filed objections to the claims of approximately twenty (20) participants represented by Shapiro & Hender.

5. The Shapiro Claims were resolved by the Court in accordance with the previously established claims resolution procedures, but the orders of the Court were later vacated on appeal to the District Court.

6. The Court held a status conference on the disposition of the Shapiro Claims on April 7, 2022. At the conclusion of the hearing, a continued status conference was scheduled for September 9, 2022.

7. During the intervening period, the parties settled the following claims:

- (i) Manal Hamadi, Claim No. 42543 (docket 3730);
- (ii) Hubert Lubin, Claim No. 42581 (docket 3730);
- (iii) Abdeltif Bellagat, Claim No. 49944 (docket 3730);
- (iv) Abdelkhalak Toqi, Claim No. 82999 (docket 3730);
- (v) Joseph Nasr, Claim No. 121700 (docket 3730);
- (vi) Ruben Nieves, Claim Nos. 131265, 130454 (docket 3738).

8. The following Shapiro Claims remain unresolved:

- (i) Panagiotis Iatrou, Claim No. 42506;
- (ii) Carlos Dalvarenga, Claim No. 76811;
- (iii) Rachid Moukhtari, Claim No. 121668;
- (iv) Peter Said Rahhaoul, Claim No. 121715;
- (v) Marcio Costa, Claim No. 122256;

- (vi) Saif Muhsen, Claim No. 122731;
- (vii) Rhaima Boughalem, Claim No. 130708;
- (viii) Meriolio Rojas, Claim No. 131600;
- (ix) Earley Barbosa, Claim No. 131618;
- (x) Hazem Wehbe, Claim No. 131665;
- (xi) George Berube, Claim No. 131699, 132,128;
- (xii) Theresa St. Peter, Claim No. 131716.

9. Counsel to the Shapiro Claimants continues to confer with their respective participant clients and believes that additional efforts to resolve the disputes consensually are warranted. Therefore, the parties request that the status hearing scheduled for November 4, 2022 be continued for approximately thirty (30) days.

WHEREFORE, the Liquidating Trustee and the Shapiro Claimants pray that the Court:

1. Continue the hearings scheduled for November 4, 2022 for thirty (30) days; and
2. Grant such other relief as is just and proper.

Respectfully Submitted,

STEPHEN B. DARR,
LIQUIDATING TRUSTEE OF TELEXFREE
INC.,
TELEXFREE LLC, AND TELEXFREE
FINANCIAL, INC.,
By his attorneys,

THE SHAPIRO CLAIMANTS,
By counsel:

/s/ Jordan Shapiro (with permission)
Jordan Shapiro
Shapiro & Hender
105 Salem Street
Malden, MA 02148
(781) 324-5200

Dated: October 28, 2022

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
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CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that I have this day caused a copy of the *Joint Motion to Continue Hearing on Objections to Certain Claims* to be served to registered parties by this Court's ECF system.

/s/ Andrew G. Lizotte

Andrew G. Lizotte (BBO #559609)

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Dated: October 28, 2022