Docket #0034 Date Filed: 9/11/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In re: TELEXFREE, INC. *ET AL.* Debtors	Chapter 11 Case No. 14-40987-MSH 14-40988-MSH_14-40989MSH (Jointly Administered)-MSH
WALDERAMA MARTIN *ET AL*, PUTATIVE CLAIMS REPRESENTATIVES AND THOSE SIMILARLY SITUATED Plaintiffs v. TELEXFREE, INC. ET AL, Defendants	Adversary Proceeding No.14-4044
ANTHONY CELLUCI *ET AL*, PUTATIVE CLASS REPRESENTATIVES AND THOSE SIMILARLY SITUATED Plaintiffs v. TELEXFREE, INC. ET AL, Defendants	Adversary Proceeding 14-4057

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PAULO EDWARDO FERRARI, PUTATIVE CLAIMS REPRESENTATIVES ON BEHALF OF HIMSELF AND THOSE SIMILARLY SITUATED ET AL. Plaintiffs v. TELEXFREE, INC. ET AL, Defendants	Adversary Proceeding 14-4080

RESPONSE TO THE COURT'S INQUIRY
CONTAINED IN ITS AUGUST, 27 2014, ORDER

In its August 27, 2014 Order the Court directed Counsel for Plaintiffs to file a statement "as to whether the actions currently pending before the Judicial Panel on Multidistrict Litigation are related to the claims asserted" in this adversary proceeding and whether this action "should also be stayed" as was Adversary Proceeding Nos. 14-4044 and 14-4057. 8-27-14 Order par. 4. In response to the Court's inquiry, Counsel for the Plaintiffs makes the following statement:

The actions currently pending before the Judicial Panel on Multidistrict Litigation are related to the claims asserted in this adversary proceeding and this action should also be stayed. This adversary proceeding arises out of the same transaction as the other actions namely, the Telexfree ponzie scheme. The plaintiffs are members of the same class of victims and the allegations and causes of action are the essentially the same in all material respects.

As in the other related adversary actions, the Plaintiffs have filed a motion to withdraw the reference based on the same grounds and are seeking to join in the Multidistrict Litigation for the same reasons asserted in the actions pending before the MDL panel. It is therefore in the interest of justice and judicial economy for this action to be allowed to proceed in the District Court and be consolidated with the other related actions, if, as is likely, the MDL panel consolidates the matters.

For these reasons, the Plaintiffs respectfully request that this adversary proceeding be subject to the same Order as the related adversary actions so that the action may be allowed to proceed in the Eastern District of Massachusetts and participate along with the other matters pending before the MDL panel.

Dated: September 11, 2014

Respectfully submitted by,

___/s/ Daniel S. Dullea_____

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