

In re:

TELEXFREE, LLC,

Debtor.

Chapter 11

TELEXFREE, INC., f/k/a COMMON CENTS

Case No. 14-40987

Adv. No. 14-04080

PAULO EDUARDO FERRARI -PUTATIVE  
CLAIMS REPRESENTATIVE ON BEHALF OF  
HIMSELF AND THOSE SIMILARLY  
SITUATED, RAFAELA SERRANO AS  
TRUSTEE OF THE TELEXFREE SETTLEMENT  
TRUST PURSUANT TO 26 USC SECTION 468B,

Plaintiffs,

v.

TELEXFREE, INC., f/k/a COMMON CENTS  
COMMUNICATIONS, INC.; TELEXFREE,  
LLC; TELEXFREE FINANCIAL, INC.;  
TELEXELECTRIC, LLLP; TELEX MOBILE,  
HOLDINGS, INC.; JAMES M. MERRILL;  
CARLOS N. WANZELER; ; STEVEN M.  
LABRIOLA; JOSEPH H. CRAFT, a/Ida JOE H.  
CRAFT; CRAFT FINANCIAL SOLUTIONS, LLC;  
CARLOS COSTA; GERALD P. NEHRA,  
individually and doing business as LAW OFFICES  
OF NERHA AND WAAK; GERALD  
P. NEHRA ATTORNEY AT LAW, PLLC;  
RICHARD W. WAAK, individually and doing  
business as LAW OFFICES OF NERHA AND  
WAAK; RICHARD W. WAAK, ATTORNEY  
AT LAW, PLLC; TD BANK, NA; CITIZENS  
FINANCIAL GROUP, INC.; CITIZENS BANK  
OF MASSACHUSETTS; FIDELITY CO  
OPERATIVE BANK, doing business as  
FIDELITY BANK; MIDDLESEX SAVINGS  
BANK; GLOBAL PAYROLL GATEWAY  
INC.; INTERNATIONAL PAYOUT SYSTEMS INC.;  
PROPAY, INC., doing business as PROPAY.COM.; BANKS  
DOE; DOE INSIDE PROMOTERS; CREDIT PROCESSORS  
DOE and PARALEGAL DOE,


Defendants.

**MOTION FOR RELIEF FROM A DISTRICT COURT  
JUDGE AND MOTION TO WITHDRAW THE REFEREN  
TO ADVERSARY PROCEEDING DOCKET #14-04080 AN  
TO TRANSFER THIS ACTION TO THE UNITED STATES  
DISTRICT COURT FOR THE DISTRICT OF  
MASSACHUSETTS**



**CERTIFICATE OF SERVICE**

I, D. Scott Dullea, counsel for the Plaintiffs, PAULO EDUARDO FERRARI - PUTATIVE CLAIMS REPRESENTATIVE ON BEHALF OF HIMSELF AND THOSE SIMILARLY SITUATED, RAFAELA SERRANO AS TRUSTEE OF THE TELEXFREE SETTLEMENT TRUST PURSUANT TO 26 USC SECTION 468B, do hereby certify that a true copy of the Plaintiff's Response to 8-27-14 Question from Judge Hoffman has been served by electronic process through the ECF system to all parties in this matter

  
D. Scott Dullea

Date: September 11, 2014