

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
Central Division

10/16/2014 MOOT. THE ADVERSARY PROCEEDING HAS BEEN STAYED. SEE ORDER AT DOCKET #38. THIS COURT DOES NOT HAVE JURISDICTION TO STAY THE MOTION TO WITHDRAW THE REFERENCE CURRENTLY PENDING BEFORE THE U.S. DISTRICT COURT.

*Michael A. Hoffmann*

In re:

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

Debtors.

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,

Plaintiff,

v.

TELEXFREE, INC, f/k/a COMMON CENTS  
COMMUNICATIONS, INC. et al.,

Defendants.

Chapter 11

Case Nos. 14-40987-MSH,  
14-40988-MSH, 14-40989-MSH

(Jointly Administered)

Adversary Proceeding  
No. 14-04080

**TRUSTEE’S MOTION TO STAY THE ACTION**

The Plaintiff, Paulo Eduardo Ferrari (the “Plaintiff”) has brought a Complaint against the Debtors and numerous other entities and individuals asserting numerous claims for violation of federal and state securities law and common law claims, including claims for fraud and misrepresentation. The Complaint, which seeks class action certification, consists of 539 paragraphs encompassing 61 pages and many of the factual allegations substantially parallel those in other complaints including the Complaint filed with the Securities and Exchange Commission and the Massachusetts Division of Securities against the Debtors and others.



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