Docket #0235 Date Filed: 7/24/2014

BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

IN RE:	:	
	:	**MDL DOCKET NO. 2566**
TELEXFREE MARKETING	:	
PRACTICES LITIGATION	:	

RESPONSE AND NOTICE OF NON-OBJECTION OF DEFENDANTS GLOBAL PAYROLL GATEWAY, INC. AND BASE COMMERCE, LLC D/B/A PHOENIX PAYMENTS TO PLAINTIFFS' MOTION FOR TRANSFER OF ACTIONS TO THE DISTRICT OF MASSACHUSETTS PURSUANT TO 28 U.S.C. § 1407

Defendants Global Payroll Gateway, Inc. ("GPG") and Base Commerce, LLC d/b/a Phoenix Payments ("Base Commerce") hereby notify the Panel that they do not object to the transfer of all actions identified in Schedule A to Plaintiffs' Motion for Transfer of Actions ("Motion") (Doc. 1, Sch. A) to the District of Massachusetts for coordinated and consolidated pretrial proceedings.[1]

Dated: July 21, 2014

s/ Andrea L. Marconi
Andrea L. Marconi (AZ Bar # 022577)
Fennemore Craig, P.C.
2394 East Camelback Road, Suite 600
Phoenix, AZ 85016
(602) 916-5424 Telephone
(602) 916-5624 Facsimile
amarconi@fclaw.com
Attorneys for Defendants Global Payroll Gateway, Inc. and Base Commerce, LLC d/b/a Phoenix Payments

[1] For numerous reasons that GPG and Base Commerce have identified in writing to counsel for plaintiffs in each of the six TelexFree Marketing Practice Litigation cases, none of the plaintiffs can establish Article III standing against GPG and/or Base Commerce and these parties should be swiftly dismissed from all proceedings. GPG and Base Commerce have no relationship or even a tangential connection to any of the class representatives in any of the TelexFree Marketing Practice Litigation cases. Without a discernable injury directly caused by GPG or Base Commerce's actions, have not and cannot allege a justiciable case or controversy against either of them.

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I, Andrea L. Marconi, hereby certify that, on July 21, 2014, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Robert J. Bonsignore, Esq.
Bonsignore, LLC
193 Plummer Hill Road
Belmont, NH 03220
Counsel for Martin and Valentim;
Cellucci; Githere

Ihuoma Igboanugo, Esq.
The Crescent Law Practice
183 Wind Chime Court, Suite 100
Raleigh, NC 27615
Counsel for Ferguson

Ronald A. Dardeno, Esq.
Dardeno Law Offices
424 Broadway
Somerville, MA 02145

Martin B. Dropkin, Esq.
Dropkin & Matza LLP
424 Broadway
Somerville, MA 02145

William D. Dalsen, Esq.
Proskauer Rose LLP
One International Place
Boston, MA 02110
Counsel for Wanzeler

William J. Hanlon, Esq.
Seyfarth Shaw, LLP
Two Seaport Lane
Boston, MA 02210
Counsel for Nehra and Waak

Lee A. Armstrong, Esq.
Lee M. Pollack, Esq.
Law Firm of Jones Day
222 E. 41st Street
New York, NY 10017
Counsel for Citizens Financial Group, Inc. and
Citizens Bank of Massachusetts

Jason C. Weida, Esq.
Law Firm of Jones Day
100 High Street
Boston, MA 02110

Lawrence P. Heffernan, Esq.
Danielle Andrews Long, Esq.
Robinson & Cole
One Boston Place
Boston, MA 02108
Counsel for Middlesex Savings Bank

Phyllis B. Sumner
King & Spalding LLP
1180 Peachtree Street, NE
Atlanta, GA 30309
Counsel for Propay, Inc.

David Hennes, Esq.
Samuel P. Groner, Esq.
Fried, Frank, Harris, Shriver & Jacobson
One New York Plaza
New York, NY 10004
Counsel for International Payout Systems, Inc.

Ian D. Roffman
Nutter McClennen & Fish, LLP
Seaport West
155 Seaport Blvd.
Boston, MA 02210
Counsel for Fidelity Co-Operative Bank

Kenneth I. Schacter
Bingham McCutchen LLP
399 Park Avenue
New York, NY 10022-4689
Counsel for Bank of America, N.A.

Seth M. Kean
Reed Smith LLP
599 Lexington Avenue, 22nd Floor
New York, NY 10022
Counsel for TD Bank, NA

Paul V. Kelly
Jackson Lewis PC
75 Park Plaza
Boston, MA 02116
Counsel for Carlos Wanzeler

I, Andrea L. Marconi, hereby certify that a copy of the foregoing document and this Certificate of Service was served by First Class Mail on July 21, 2014 to the following:

Clerk of Court
United States Bankruptcy Court
District of Massachusetts
Donohue Federal Building
595 Main Street, Room 211
Worcester, MA 01608

Clerk of Court
United States District Court
Southern District of Florida
400 North Main Miami Avenue
Miami, FL 33128

Clerk of Court
United States District Court
Eastern District of North Carolina
310 New Bern Avenue
Raleigh, NC 27601

Clerk of Court
United States District Court
Northern District of Georgia
121 Spring Street, S.E., Room 201
Gainesville, GA 30501

Re: Waldemara Martin and Leandro Valentim v. TelexFree, Inc., et al.
U.S.D.C. Massachusetts Bankruptcy, Adversary Proceeding No. 1:14-04044

Counsel for US Trustee, Stephen Darr:
Charles R. Bennett, Jr., Esq.
Murphy & King
One Beacon Street
Boston, MA 02108

Counsel for Linda Hackett (Interested Party):
Jordan L. Shapiro, Esq.
Shapiro & Hender
105 Salem Street
Malden, MA 02148

Counsel for Angel Medina (Interested Party):
Mark C. Rossi, Esq.
Esher Rossi LLC
One Boston Place, 26th Floor
Boston, MA 02108

Counsel for Victoria Perez (Interested Party):
Roger Bertling, Esq.
122 Boylston Street
Jamaica Plain, MA 02130

Re: Felicia Guevara v. James M. Merrill, et al.
U.S.D.C. Southern District of Florida, Civil Action No. 1:14-22405

Plaintiff's Counsel:
Adriana Contartese, Esq.
Law Offices of Adriana Contartese
368 West Broadway, 2nd Floor
Boston, MA 02127

Re: Todd Cook v. TelexElectric, LLLP, et al.
U.S.D.C. Northern District of Georgia, Civil Action No. 2:14-00134

Plaintiffs' Counsel:
Mark A. Tate, Esq.
Tate Law Group, LLC
2 East Bryan Street, Suite 600
P.O. Box 9060
Savannah, GA 31412

Defendants:

Registered Agent for TelexElectric, LLP:
c/o BWFC Processing Center, LLC
Registered Agents
3960 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169

Registered Agent for TelexMobile Holdings, Inc.:
c/o BWFC Processing Center, LLC
Registered Agents
3960 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169

TelexFree Financial, Inc.
2321 N.W. 37th Avenue
Coconut Creek, FL 33063

TelexFree, Inc.
225 Cedar Hill Street
Suite 118
Marlborough, MA 01752

TelexFree, LLC
4705 S. Durango Drive
#100-J51
Las Vegas, NV 89147

James M. Merrill
1 Coburn Drive
Ashland, MA 01721

John F. Merrill
7 Kinnicutt Road
Worcester, MA 01602

Steven M. Labriola
21 Kiwanis Beach Road
Upton, MA 01568

Joseph H. Craft
333 W. Tennyson Road
Boonville, IN 47601

Craft Financial Solutions, LLC
825 East Main Street
Boonville, IN 47601

Joe Craft, CPA
825 East Main Street
Boonville, IN 47601

Carlos Costa
225 Cedar Hill Street
Suite 118
Marlborough, MA 01752

Sanderley Rodrigues De Vasconcelos
100 Stockton Street, Apt. 49
Chelsea, MA 02150

WWW Global Business, Inc.
189 Squire Road, Suite 40
Revere, MA 02151

Santiago De La Rosa
189 Beacon Hill Avenue, Unit 2
Lynn, MA 01902

Randy N. Crosby
30 Club Court
Alpharetta, GA 30005

Faith R. Sloan
515 E. End Avenue, Unit 105
Calumet City, IL 60409

Fidelity Bank
675 Main Street
Fitchburg, MA 01420

FMR, LLC
245 Summer Street, F7B
Boston, MA 02110

Fidelity Investments
245 Summer Street, F7B
Boston, MA 02110

Waddell & Feed Financial, Inc.
Waddell & Reed, Inc.
281 Winter Street
Waltham, MA 02451

Wells Fargo & Company
201 Washington Street
Boston, MA 02109

Wells Fargo Bank, N.A.
201 Washington Street
Boston, MA 02109

Phoenix Payments
7910 S. Kyrene Road
Suite 106
Tempe, AZ 85284

Vantage Payments, LLC
8300 N. Hayden Road, #A207
Scottsdale, AZ 85251

s/ *Andrea L. Marconi*
Andrea L. Marconi, Esq.
AZ BAR 022577
FENNEMORE CRAIG, P.C.
2394 E. Camelback Road, Suite 600
Phoenix, AZ 85016
Telephone: 602-916-5000
amarconi@fclaw.com