Docket #0261 Date Filed: 8/16/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re	)	
TELEXFREE, LLC,	)	Chapter 11
	)	Case No. 14-40987 MSH
Debtor,	)	
	)	
ANTHONY CELLUCCI, JAMILLY LAKE AND GERIVALDO PACHECO – Putative Claims Representatives' And Those Similarly Situated	)	Adversary Proceeding No. 14-04057 MSH
Plaintiffs,	)	
v.	)	
TELEXFREE, LLC, et. al.	)	
Defendants.	)	

STIPULATION TO IMPOSE TEMPORARY STAY

WHEREAS, on May 15, 2014, Anthony Cellucci, Jamilly Lake and Gerivaldo Pacheco – Putative Claims Representatives And Those Similarly Situated ("Plaintiffs") filed the Complaint initiating this Adversary Proceeding and a Motion to Withdraw Reference seeking to refer this Adversary Proceeding to the District Court for the District of Massachusetts; and,

WHEREAS, on July 1, 2014, Motion to Transfer and Consolidate Six Actions, including the present action, was filed before the Judicial Panel on Multidistrict Litigation (See In Re: TelexFree Marketing Practices Litigation, MDL no. 2566, dkt. no. 1), which Motion is currently pending before the Panel; and,

WHEREAS, on August 7, 2014, Stephen Darr, the Chapter 11 Trustee of the Debtors' Estates, filed his Motion to Stay the present action; and,

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WHEREAS, on August 8, 2014, Stephen Darr, as Chapter 11 Trustee, filed his Opposition to the Plaintiffs' aforesaid Motion to Withdraw Reference in the District Court; and,

WHEREAS, the resolution of the aforesaid Motion to Transfer, currently pending before the Judicial Panel on Multidistrict Litigation, may render the Plaintiffs' Motion to Withdraw Reference and Trustee's Motion to Stay moot;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the Plaintiffs and for Stephen Darr, Chapter 11 Trustee of the Debtors' Estates, as follows:

1. That hearing and determination of the Trustee's Motion to Stay the Action shall be suspended until such time as there has been a determination of the aforesaid Motion to Transfer by the Judicial Panel on Multidistrict Litigation; and,
2. That, until such time, the present action shall be subject to a temporary stay; and,
3. That the Trustee shall not object to the Plaintiffs' Opposition to the Trustee's Motion to Stay on grounds of delay or lack of timeliness occasioned by the present stipulation

Dated: August 14, 2014

/s/ Ronald A. Dardeno

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Attorney for Plaintiffs Anthony Cellucci, Jamilly Lake and Gerivaldo Pacheco, Putative Claims Representatives and Those Similarly Situated

Dated: August 14, 2014

/s/ Charles R. Bennett, Jr.

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Attorney for Stephen Darr, Duly Appointed Trustee of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc.

CERTIFICATE OF SERVICE

I, Ronald A. Dardeno, hereby certify that, on August 22, 2014, a copy of the foregoing document was served upon Parties appearing before this Court via the Court's electronic notification system, and by all other Parties via First Class mail.

Dated: August 14, 2014

/s/ Ronald A. Dardeno
Ronald A. Dardeno, Esq.