Docket #0010 Date Filed: 6/15/2016

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Debtors.	Chapter 11 Cases 14-40987-MSH 14-40988-MSH 14-40989-MSH Jointly Administered
STEPHEN DARR, AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS, Plaintiff, v. HANNA-SHEA CONSULTING, LLC, Defendant.	Adversary Proceeding No. 16-4028

MOTION FOR ENTRY OF DEFAULT

Stephen B. Darr, as he is the Trustee (the "Trustee") of the Chapter 11 estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), moves pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, as incorporated herein by Rule 7055 of the Rules of Bankruptcy Procedure, that the Defendant Hanna-Shea Consulting, LLC be defaulted for failure to answer or otherwise defend this action.

In support of his motion, the Trustee states that the Defendant was served with a copy of the Summons and the Complaint, and has failed to defend. In further support, the Trustee relies on the Affidavit of Andrew G. Lizotte, Esquire, annexed hereto as Exhibit A.



WHEREFORE, the Stephen B. Darr, as he is the Trustee of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc., respectfully prays that his Motion be allowed and that this Court enter an order defaulting Hanna-Shea Consulting, LLC.

STEPHEN DARR AS HE IS THE
TRUSTEE OF THE CHAPTER 11
ESTATES OF EACH OF THE DEBTORS
By his attorneys,

/s/ Andrew G. Lizotte
Charles R. Bennett, Jr. (BBO #037380)
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108
(617) 423-0400
ALizotte@murphyking.com

Dated: June 15, 2016
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AFFIDAVIT OF ANDREW LIZOTTE IN SUPPORT
OF TRUSTEE'S MOTION FOR ENTRY OF DEFAULT

I, Andrew Lizotte, being duly sworn, depose and state that:

1. I am a member of the law firm of Murphy & King, which law firm is counsel to Stephen Darr, as he is the Chapter 11 Trustee (the "Trustee") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (the "Debtors"). I am making this affidavit based upon my personal knowledge except with respect to those statements made on information and belief, and as to those statements, I believe them to be true based upon the books and records of the Debtors.

2. On April 1, 2016, the Trustee commenced this action by filing the Complaint.

3. On or about April 8, 2016, I caused a copy of the Summons and Complaint to be mailed, by first class mail and certified mail – return receipt requested, upon the Defendant at 2040 S. Alma School Road, Suite 1-255, Chandler, AZ 85286.

4. The address was furnished to me by the professionals retained by the Trustee who gathered the information from the Debtors' books and records and took various steps to confirm the addresses. The Defendant acknowledged receipt of the certified mail delivery.

5. A certificate of service was filed on or about April 13, 2016.

6. The deadline to file an answer or other responsive pleading was May 2, 2016. The docket reflects that no responsive pleading has been filed.

Signed under the pains and penalties of perjury this 15th day of June, 2016.

Andrew G. Lizotte

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DISTRICT OF MASSACHUSETTS

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CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that I have on this day caused to be served a copy of the Motion for Entry of Default by First Class Mail, Postage Prepaid to the following:

Hanna-Shea Consulting, LLC
2040 S. Alma School Road
Suite 1-255
Chandler AZ 85286

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston MA 02108
617-423-0400
ALizotte@murphyking.com

DATED: June 15, 2016
710885