Docket #0064 Date Filed: 10/5/2016

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., TelexFree.	Chapter 11 Cases 14-40987-MSH 14-40988-MSH 14-40989-MSH Jointly Administered
STEPHEN B. DARR AS TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiffs, v. RITA DOS SANTOS, INDIVIDUALLY AND AS PUTATIVE CLASS REPRESENTATIVE, AND MARIA MURDOCH, ANGELA BATISTA JIMENEZ, ELISANGELA OLIVEIRA AND DIOGO DE ARAUGO, AS PUTATIVE CLASS REPRESENTATIVES, Defendants.	Adversary Proceeding No. 15-04055

SUPPLEMENT TO STIPULATION OF PLAINTIFFS' INTERIM EXECUTIVE COMMITTEE AND CHAPTER 11 TRUSTEE REGARDING SETTLEMENT CONFERENCE IN ADVERSARY PROCEEDING NO. 15-4055

This agreement shall supplement (the "Supplement") the Stipulation of Plaintiffs' Interim Executive Committee ("PIEC") and Chapter 11 Trustee ("Trustee") Regarding Settlement Conference in Adversary Proceeding No. 15-4055 (the "Stipulation") executed prior to September 14, 2016 by and between the Trustee and the PIEC (collectively, the "Parties").

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1. Prior to September 14, 2016, the Parties entered into the Stipulation in order to govern the conduct of the Parties and the admissibility of evidence in connection with a Settlement Conference held on or about September 14, 2016 with the Court respecting this adversary proceeding.
2. Following the Settlement Conference, the Parties have agreed to participate in mediation (the "Mediation") with the Honorable Michael A. Fagone, United States Bankruptcy Judge in the United States Bankruptcy Court for the District of Maine.
3. Pursuant to this Supplement, the Parties agree and confirm that all of the terms and conditions of the Stipulation shall remain in full force and effect in connection with the Mediation, including without limitation as it relates to submission of materials to the mediator and attendance at all Mediation sessions.

STEPHEN B. DARR AS TRUSTEE
OF THE ESTATES OF TELEXFREE,
LLC, TELEXFREE, INC. and
TELEXFREE FINANCIAL, INC.

By his attorneys,

Dated: October 4, 2016

/s/ Andrew G. Lizotte
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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 B. DARR AS TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiffs, v. RITA DOS SANTOS, INDIVIDUALLY AND AS PUTATIVE CLASS REPRESENTATIVE, AND MARIA MURDOCH, ANGELA BATISTA JIMENEZ, ELISANGELA OLIVEIRA AND DIOGO DE ARAUGO, AS PUTATIVE CLASS REPRESENTATIVES, Defendants.	Adversary Proceeding No. 15-04055

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on October 5, 2016, I caused to be served a copy of the *Supplement to Stipulation of Plaintiffs' Interim Executive Committee and Chapter 11 Trustee Regarding Settlement Conference in Adversary Proceeding* by first class mail, postage prepaid to the following:

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DATED: October 5, 2016
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