United States Bankruptcy Court
District of Massachusetts

Darr,
Plaintiff

Adv. Proc. No. 18-04091-msh

Internal Revenue Service,
Defendant

CERTIFICATE OF NOTICE

District/off: 0101-4 User: telam Page 1 of 1 Date Rcvd: Dec 13, 2019
Form ID: pdf012 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 15, 2019.
NO NOTICES MAILED.

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
ust +E-mail/Text: USTPRegion01.WO.ECF@usdoj.gov Dec 14 2019 00:24:33 Richard King,
Office of US. Trustee, 446 Main Street, 14th Floor, Worcester, MA 01608-2361
TOTAL: 1

***** BYPASSED RECIPIENTS *****
NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 15, 2019 Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 13, 2019 at the address(es) listed below:
Andrew G. Lizotte on behalf of Plaintiff Stephen Darr agl@murphyking.com, bankruptcy@murphyking.com;pas@murphyking.com;ddk@murphyking.com;agl@murphyking.com;ecf-72a6723957cc@ecf.pacerpro.com
Charles R. Bennett, Jr. on behalf of Plaintiff Stephen Darr cbennett@murphyking.com, bankruptcy@murphyking.com;imccormack@murphyking.com;ecf-ca5a5ac33a04@ecf.pacerpro.com
Harold B. Murphy on behalf of Plaintiff Stephen Darr bankruptcy@murphyking.com, dkonusevska@murphyking.com
Lauren Hume on behalf of Counter-Claimant Internal Revenue Service lauren.e.hume@usdoj.gov, northern.taxcivil@usdoj.gov
Lauren Hume on behalf of Defendant Internal Revenue Service lauren.e.hume@usdoj.gov, northern.taxcivil@usdoj.gov
TOTAL: 5

1440987191216000000000004

12/13/2019 Allowed.

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. UNITED STATES OF AMERICA, DEPARTMENT OF THE TREASURY, INTERNAL REVENUE SERVICE, Defendant.	Adversary Proceeding No. 18-4091

MOTION FOR LEAVE TO FILE SURREPLY
BY CHAPTER 11 TRUSTEE TO UNITED STATES OF AMERICA'S
SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT

Stephen B. Darr, the Chapter 11 Trustee ("Trustee") of the bankruptcy estates ("Estates") of TelexFree LLC, TelexFree Inc., and TelexFree Financial Inc. (collectively, "TelexFree") respectfully moves pursuant to L.R. 7.1(B)(3) for leave to file the accompanying 10-page surreply brief in opposition to the Second Motion by the United States of America (the "Service") for Partial Summary Judgment on Counts I, II, and III of the Complaint.

The surreply is narrowly tailored to address certain issues raised in the Service's Reply brief, including: