Docket #0580 Date Filed: 2/24/2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:	Chapter 11 Cases
TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Reorganized Debtors.	14-40987-EDK 14-40988-EDK 14-40989-EDK Substantively Consolidated
STEPHEN B. DARR, TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiff, v. FRANZ BALAN, A REPRESENTATIVE OF A CLASS OF DEFENDANT NET WINNERS, Defendants.	Adversary Proceeding No. 16-4006
STEPHEN B. DARR AS TRUSTEE OF THE ESTATES OF TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Plaintiff, v. MARCO PUZZARINI AND SANDRO PAULO FREITAS, REPRESENTATIVES OF A CLASS OF DEFENDANT NET WINNERS, Defendants.	Adversary Proceeding No. 16-4007

WITHDRAWAL OF MOTION

Class Representatives Frantz Balan, Marco Puzzarini, and Sandro Paulo Freitas (the "Class Representatives"), on behalf of classes of alleged "net winner" Defendants in

Darr v. Argueta, Adv. Pro. 16–4006 (the "Domestic Case") and *Darr v. Alecci*, Adv. Pro. 16–4007 (the "International Case"), hereby withdraw [576] Motion of Defendant Classes to Extend "Phase I" deadlines to complete discovery and expert report and request cancellation of the hearing set for March 9, 2023 at 12:30 PM before the Honorable Judge Elizabeth D. Katz, Courtroom 3, Harold Donohue, Federal Building and Courthouse, 595 Main Street, Worcester, MA. As grounds for withdrawal, Class Representatives state that they have reached an agreement with the Trustee to resolve the scheduling issues and will be filing a joint motion concerning the agreed-upon schedule.

Respectfully submitted,

FRANTZ BALAN,
CLASS REPRESENTATIVE FOR
DOMESTIC CLASS ACTION,

MARCO PUZZARINI AND SANDRO PAULO FREITAS,
CLASS REPRESENTATIVES
FOR INTERNATIONAL CLASS ACTION,

By their counsel,

Dated: February 24, 2023

/s/ Ilyas J. Rona

Ilyas J. Rona (BBO #642964)
Michael J. Duran (BBO # 569234)
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CERTIFICATE OF SERVICE

I, Ilyas J. Rona, hereby certify that I have caused a copy of the **Joint Motion to Extend "Phase I" Deadlines to Complete Discovery and Expert Report** to be served on counsel for the Trustee by email as follows and all registered electronic filers appearing in this case via the Court's CM/ECF system:

Charles R. Bennett, Jr.
MURPHY & KING P.C.
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Boston, MA 02109
cbennett@murphyking.com

Dated: February 24, 2023

/s/ Ilyas J. Rona
Ilyas J. Rona, Esq.