Docket #0613 Date Filed: 9/26/2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC., Reorganized Debtors.	Chapter 11 Cases 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

ASSENTED-TO MOTION BY DEFENDANT CLASSES TO EXTEND TIME TO RESPOND TO MOTIONS TO STRIKE

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"), respectfully request that the deadline for them to respond to the Motions to Strike be extended until Friday, September 29, 2023. In support thereof, the Class Representatives state as follows:

1. On September 11, 2023, the Trustee filed a Motion to Strike the Affidavit of Franz Balan in both the International Case and the Domestic Case (the "Motions to Strike"). (*Domestic Case* ECF No. 456; *International Case* ECF No. 605.)

2. On September 21, 2023, the Class Representatives and the Trustee conferred on a number of issues, and the Trustee granted an extension of time for the Class Defendants to file oppositions to the Motions to Strike.

3. The Class Representatives now request that they be granted until Friday, September 29, 2023, to file an opposition to the Motions to Strike.

WHEREFORE, the Class Representatives hereby respectfully request that they be granted until Friday, September 29, 2023, to file any opposition to the Motions to Strike.

FRANTZ BALAN,
CLASS REPRESENTATIVE FOR
DOMESTIC CLASS ACTION,

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

By their counsel,

Dated: September 26, 2023

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

I, Michael J. Duran, hereby certify that I have caused a copy of the foregoing Motion to be served on counsel for the Trustee and all registered electronic filers appearing in this case via the Court's CM/ECF system.

Dated: September 26, 2023

/s/Michael J. Duran
Michael J. Duran, Esq.