Docket #0618 Date Filed: 10/2/2023

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

JOINT PRETRIAL MEMORANDUM

Relative to *Darr v. Argueta*, Adv. Pro. 16–4006 (the "Domestic Case") and *Darr v. Alecci*, Adv. Pro. 16–4007 (the "International Case"), and pursuant to the Proceeding Memorandum and Order entered therein [ECF No. 452 - Domestic Case/ECF No. 601 -

International Case], Stephen B. Darr, Liquidating Trustee, and Class Representatives Frantz Balan, Marco Puzzarini, and Sandro Paulo Freitas (the "Class Representatives"), on behalf of classes of alleged "net winner" in the "Domestic Case") and the "International Case", hereby submit this joint pretrial memorandum.

A. The Name, Address, and Telephone Number of Each Witness Each Party Expects to Present and those Witnesses to be Called Only if the Need Arises.

1. Trustee

a. Will call:

i. Cameron Freer, PhD.

b. May call:

i. Stephen B. Darr

ii. Jean Louis Serrondo (Trustee will move to allow Mr. Serrondo, a Florida resident, to testify by video link)

2. Class Representatives

a. Will call:

i. Joshua Dennis

b. May call:

i. Frantz Balan

ii. Rosmery Torrico

iii. Benjamin Argueta

Both Parties reserve the right to supplement with additional witnesses; provided however, all supplemental lists must be produced to opposing counsel no later than Monday, October 9 at 5:00 pm.

For the reasons set forth in a forthcoming motion to strike, Class Defendants object to the testimony of Stephen B. Darr and Jean Louis Sorondo.

B. Witness Testimony to be Introduced by Deposition Transcript or Video or Both

1. Trustee

a. Ingrid Laplanche, February 15, 2023

b. Ivan Alvarenga, February 15, 2023

c. Rudeidamia A. Calcano, February 15, 2023

d. Arismendy Alexandry Disla, February 21, 2023

e. Martiza Elizabeth Garcia, February 21, 2023

f. Selvi Vanessa Lewis Reynaga, February 23, 2023

g. Andrew Tranjano De Costa Silveira, February 23, 2023

h. Suellen Schmidt, February 24, 2023

i. Bruno Graziani, March 16, 2023

j. Amilcar Frederico Lopez Garcia, March 16, 2023

2. Class Representatives

a. Rosmery Torrico, January 19, 2023

b. Benjamin Argueta, March 16, 2023

c. Ella Maria Reid, February 22, 2023

d. Arismendy Alexandry Disla, February 21, 2023

e. Selvi Vanessa Lewis Reynaga, February 23, 2023

f. Amilcar Frederico Lopez Garcia, March 16, 2023

Both Parties reserve the right to supplement with additional witnesses, provided however, all supplemental lists must be produced to opposing counsel no later than Monday, October 9 at 5:00 pm.

C. Joint List of Agreed Exhibits

Ex. No.	Exhibit Description

D. Disputed Exhibits

1. Exhibits to be Offered by Trustee

Ex. No	Exhibit Description	Objection
P-001	April 29, 2022 Expert Report of Dr. Cameron E. Freer, including exhibits	
P-002	May 22, 2023 Reply Report of Dr. Cameron E. Freer, including exhibits	
P-003	CV of Dr. Cameron Freer	
P-004	Account Table (*representante*)	Objection – Subject to Review
P-005	Bonus Table (*bonus*)	Objection – Subject to Review
P-006	Field Description Table (*10ksample.xlsx*)	Objection – Subject to Review

Ex. No	Exhibit Description	Objection
P-007	Invoice Table (*fatura*)	Objection – Subject to Review
P-008	Summary Table (*rep_id_summary*)	Objection – Subject to Review
P-009	Transfer Table (*transferencia*)	Objection – Subject to Review
P-010	Borelian Aggregation Methodology code execution instructions	
P-011	A. Ferrante and J. Boyd. A transparent and transportable methodology for evaluating Data Linkage software. *Journal of Biomedical Informatics* 45, no. 1: 165-172, 2012.	
P-012	A. Saeedi, M. Nentwig, E. Peukert, and E. Rahm. Scalable matching and clustering of entities with FAMER. *Complex Systems Informatics and Modeling Quarterly* 16: 61-83, 2018.	
P-013	Charpentier, Bertrand. Multi-scale clustering in graphs using modularity. Master's thesis,KTH, 2019	
P-014	Christen, P. (2011). A survey of indexing techniques for scalable record linkage and deduplication. IEEE Transactions on Knowledge and Data Engineering, 24(9), 1537-1555	
P-015	D. Cai, N. Ackerman, and C. Freer. Priors on exchangeable directed graphs, Electronic Journal of Statistics, 10, no. 2, 3490–3515, 2016.	
P-016	D. Resnick and J. Asher. Measurement of Type I and Type II Record Linkage Error. Proceedings of the American Statistical Association, Government Statistics Section; Arlington, VA, USA: American Statistical Association; 2019. pp. 293–311.	
P-017	Dusetzina SB, Tyree S, Meyer AM, Meyer A, Green L, and Carpenter WR. Linking Data for Health Services Research: A Framework and Instructional Guide. US Agency for Healthcare Research and Quality, Rockville, MD, 2014.	
P-018	Enamorado, T., Fifield, B., and Imai, K. (2019). Using a probabilistic model to assist merging of large-scale administrative records. *American Political Science Review*, 113(2), 353-371	
P-019	F. Saad, N. Ackerman, C. Freer, and V. Mansinghka. A family of exact goodness-of-fit tests for high-dimensional discrete distributions, Proceedings of the 22nd International Conference on Artificial Intelligence and Statistics, PMLR 89, 1640–1649, 2019.	
P-020	Fellegi, I. P. and Sunter, A. B. (1969). A theory for record linkage. Journal of the American Statistical Association, 64(328), 1183-1210.	

Ex. No	Exhibit Description	Objection
P-021	Hernández, M.A. and Stolfo, S.J. Real-world Data is Dirty: Data Cleansing and The Merge/Purge Problem. Data Mining and Knowledge Discovery 2, 9–37 (1998)	
P-022	J. S. Murray, "Probabilistic Record Linkage and Deduplication after Indexing, Blocking, and Filtering". Journal of Privacy and Confidentiality (2015–2016)	
P-023	J. Talburt, *Entity Resolution and Information Quality*. Elsevier, 2011, pp. 84-85 of	
P-024	Kabudula, C.W., Clark, B.D., Gómez-Olivé, F.X., Tollman, S., Menken, J. and Reniers, G. The promise of record linkage for assessing the uptake of health services in resource constrained settings: a pilot study from South Africa. BMC Med Res Methodol 14, 71 (2014)	
P-025	L. Getoor and A. Machanavajjhala, Entity Resolution: Tutorial, Advances in Social Network Analysis and Mining, 2012	
P-026	Modern Scientific Evidence, Vol. I, §4:13, pp. 340-344	
P-027	N. Ackerman, C. Freer, and D. Roy. On the computability of conditional probability, Journal of the ACM 66, no. 3, 23:1–23:40, 2019.	
P-028	O. Hassanzadeh, F. Chiang, H. C. Lee, and R. J. Miller. Framework for evaluating clustering algorithms in duplicate detection. *Proceedings of VLDB '09*: 1282-1293, 2009.	
P-029	Olivier Binette and Rebecca C. Steorts, (Almost) All of Entity Resolution, arXiv:2008.04443,2022	
P-030	Ong TC, Duca LM, Kahn MG, and Crume TL. A hybrid approach to record linkage using a combination of deterministic and probabilistic methodology. J Am Med Inform Assoc.2020;27(4):505-513	
P-031	P. Christen, *Data Matching*, Data-Centric Systems and Applications, Springer-Verlag, 2012.	
P-032	P. Christen, T. Ranbaduge, and R. Schnell. *Linking sensitive data: Methods and techniques for practical privacy-preserving information sharing.* Springer, 2020, p. 25	
P-033	P. Christen. Data linkage: The big picture. *Harvard Data Science Review*, 1(2), 2019.	
P-034	Parag Singla and Pedro Domingos, Multi-Relational Record Linkage. KDD-2004 Workshop on MultiRelational Data Mining, pp. 31-48	

Ex. No	Exhibit Description	Objection
P-035	Philip A. Collender, Zhiyue Tom Hu, Charles Li, Qu Cheng, Xintong Li, Yue You, Song Liang, Changhong Yang, and Justin V. Remais. Machine-learning classifiers for logographic name matching in public health applications: approaches for incorporating phonetic, visual, and keystroke similarity in large-scale probabilistic record linkage. arXiv:2001.01895, 2020.	
P-036	*Proceedings of the 2013 ACM Workshop on Digital Identity Management*, pp. 25-36. 2013	
P-037	R. Linacre, *Splink and the Open Source Dividend*, March 9, 2023. Retrieved from https://www.robinlinacre.com/open_source_dividend/	
P-038	R. Linacre, *The Intuition Behind the Use of Expectation Maximisation to Train Record Linkage Models,* October 14, 2022. Retrieved from https://www.robinlinacre.com/em_intuition/	
P-039	Radford M. Neal and Geoffrey E. Hinton. A view of the EM algorithm that justifies incremental, sparse, and other variants. Learning in Graphical Models. Springer, 1998. 355-368	
P-040	Randall, S.M., Ferrante, A.M., Boyd, J.H., Semmens J.B. The effect of data cleaning on record linkage quality. BMC Med Inform Decis Mak 13, 64 (2013)	
P-041	S. Emmons, S. Kobourov, M. Gallant, and K. Börner. Analysis of network clustering algorithms and cluster quality metrics at scale. PloS One, 11(7): (2016).	
P-042	Scott L DuVall, Richard A Kerber, Alun Thomas "Extending the Fellegi-Sunter probabilistic record linkage method for approximate field comparators", *J Biomed Inform*. 2010; 43(1):24-	
P-043	Sneath, P.H.A and Sokal, R.R.. *Numerical Taxonomy: the Principles and Practice of Numerical Classification*. Freeman, New York (1973)	
P-044	T. Enamorado and K. Imai. Validating Self-Reported Turnout by Linking Public Opinion Surveys with Administrative Records. Public Opinion Quarterly, Volume 83, Issue 4, Winter 2019	
P-045	T. Enamorado, B. Fifield, and K. Imai. Using a probabilistic model to assist merging of large-scale administrative records. *American Political Science Review*, 113(2), 353-371, 2019.	
P-046	*The Intuition Behind the Use of Expectation Maximization to Train Record Linkage Models,* October 14, 2022	
P-047	The Role of Expert Judgment in Statistical Inference and Evidence-Based Decision Making, The American Statistician, Vol. 73, No. 51, p. 67 (2019)	

Ex. No	Exhibit Description	Objection
P-048	Tom Jackson, Caris Greyson, Ian Rickard and Andromachi Tseloni. Data First: Criminal Courts Linked Data. An exploratory analysis of returning defendants and the potential of linked criminal courts data from 2011 to 2019 in England and Wales. Ministry of Justice Analytical Series, UK Ministry of Justice, 2022.	
P-049	Uday Kamath and John Liu. *Explainable Artificial Intelligence: An Introduction to Interpretable Machine Learning*. Springer, 2021	
P-050	V. Christophides, V. Efthymiou, T. Palpanas, G. Papadakis, and K. Stefanidis. An overview of end-to-end entity resolution for big data. *ACM Computing Surveys* (CSUR) 53, no. 6: 1-42. 2020.	
P-051	Wes McKinney. *Python for Data Analysis*, 2nd Edition, 2017.	
P-052	William E. Winkler and Yves Thibaudeau. *An application of the Fellegi-Sunter model of record linkage to the 1990 US decennial census.* US Bureau of the Census, 1991	
P-053	Winkler, W. E. Using the EM Algorithm for Weight Computation in the Fellegi-Sunter Model of Record Linkage, American Statistical Association, *Proceedings of the Section on Survey Research Methods,* 667-671 (1988)	
P-054	Winkler, W. E.: String Comparator Metrics and Enhanced Decision Rules in the Fellegi- Sunter Model of Record Linkage. In: Proceedings of the Section on Survey Research. American Statistical Association, pp. 354–359, 1990.	
P-055	X Yan, LGS Jeub, A Flammini, F Radicchi, and S Fortunato. Weight thresholding on complex networks. Physical Review E 98.4 (2018): 042304	
P-056	Y. Y. Yao. Information-theoretic measures for knowledge discovery and data mining. In Entropy Measures, Maximum Entropy Principle and Emerging Applications, pages 115–136.Karmeshu (ed.), Springer, 2003.	
P-057	Y. Zhu, Y. Matsuyama, Y. Ohashi, and S. Setoguchi. When to conduct probabilistic linkage vs. deterministic linkage? A simulation study. Journal of Biomedical Informatics 56 (2015): (80-86).	
P-058	Yang, J. and Leskovec, J.. Defining and evaluating network communities based on ground- truth. Knowledge and Information Systems, 42(1): 2015, 181-213.	
P-059	"Address Verification Service" Wikipedia Page (https://en.wikipedia.org/wiki/Address_verification_service)	Objection – relevance, foundation, hearsay
P-060	"difflib" (https://docs.python.org/3/library/difflib.html)	

Ex. No	Exhibit Description	Objection
P-061	"FuzzyWuzzy: Fuzzy String Matching in Python" (https://chairnerd.seatgeek.com/fuzzywuzzy-fuzzy-string-matching-in-python/)	
P-062	"Hammermill Paper" (https://www.hammermill.com/products/premium-inkjet-laser-printer-paper)	Objection – relevance, foundation, hearsay
P-063	"Portuguese name" (https://en.wikipedia.org/wiki/Portuguese_name)	Objection – relevance, foundation, hearsay
P-064	"Precision and recall" (https://en.wikipedia.org/wiki/Precision_and_recall)	Objection – relevance, foundation, hearsay
P-065	"Units of paper quantity" (https://en.wikipedia.org/wiki/Units_of_paper_quantity)	Objection – relevance, foundation, hearsay
P-066	"When to use which fuzz function to compare two strings" (https://stackoverflow.com/questions/31806695/when-to-use-which-fuzz-function-to-compare- 2-strings)	
P-067	"Código de Endereçamento Postal" (https://en.wikipedia.org/wiki/C%C3%B3digo_de_Endere%C3%A7amento_Postal)	Objection – relevance, foundation, hearsay
P-068	"CPF number" (https://en.wikipedia.org/wiki/CPF_number)	Objection – relevance, foundation, hearsay
P-069	"m and u probabilities" (https://observablehq.com/@robinl/m-and-u-probabilities)	
P-070	"National identification number" (https://en.wikipedia.org/wiki/National_identification_number)	Objection – relevance, foundation, hearsay
P-071	"North American Numbering Plan" (https://en.wikipedia.org/wiki/North_American_Numbering_Plan)	Objection – relevance, foundation, hearsay
P-072	"RFC 2822" (https://datatracker.ietf.org/doc/html/rfc2822)	
P-073	"Telephone numbers in Brazil" (https://en.wikipedia.org/wiki/Telephone_numbers_in_Brazil)	Objection – relevance, foundation, hearsay
P-074	Apache Spark Engine (https://spark.apache.org/)	
P-075	Developing Standard Tools for Data Linkage (https://www.ons.gov.uk/methodology/methodologicalpublications/generalmethodology/onsworkingpaperseries/developingstandardtoolsfordatalinkagefebruary2021)	
P-076	DL1 INC. (001098948) on https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSummary.aspx?sysvalue=WhUPoood4i5N_.888WGoiFsKd7tj6NldVysifMSuXQA-	
P-077	DLX FINANCIAL LLC (201036310329) on https://bizfileonline.sos.ca.gov/search/business	

Ex. No	Exhibit Description	Objection
P-078	Fuzzy Matching and Deduplicating Hundres of Millions of Records with Splink (https://www.robinlinacre.com/introducing_splink/)	
P-079	Pandas Python library (https://pandas.pydata.org/)	
P-080	Pattern Matching: The Gestalt Approach (https://www.drdobbs.com/database/pattern- matching-the-gestalt-approach/184407970?pgno=5)	
P-081	Qualtrics, Sample size calculator, April 12, 2023. Retrieved from https://www.qualtrics.com/blog/calculating-sample-size/	
P-082	RapidFuzz Library (https://github.com/maxbachmann/RapidFuzz)	
P-083	RFCs are specifications for Internet services, and RFCs 2821 and 2822 concern email addresses. For RFC 2822 specifically, see "RFC 2822", retrieved from https://datatracker.ietf.org/doc/html/rfc2822	
P-084	SHAL GROUP LLC (201134810007) on https://bizfileonline.sos.ca.gov/search/business	
P-085	Splink Python package (https://github.com/moj-analytical-services/splink)	
P-086	UK Office of National Statistics. (2021). Splink: MoJ's open source library for probabilistic record linkage at scale. (https://www.gov.uk/government/publications/joined-up-data-in-government-the-future-of-data-linking-methods/splink-mojs-open-source-library-for- probabilistic-record-linkage-at-scale)	
P-087	Supplemental Order Respecting Motion by Chapter 11 Trustee for Entry of Order Finding That Debtors Engaged in Ponzi and Pyramid Scheme and Related Relief [A.P. No. 14-40987, Doc. 687], January 26, 2016.	
P-088	Affidavit of Jean Louis Sorondo in Support of Opposition by Trustee to Domestic & International Class Representatives' Motion for Summary Judgment and Cross-Motion by Trustee for Summary Judgment, including exhibits	Objection – subject to motion to strike as improper expert testimony and untimely disclosure; lack of foundation, lack competence, lack of qualification, hearsay

Ex. No	Exhibit Description	Objection
P-089	Affidavit of Stephen B. Darr in Support of Opposition by Trustee to Domestic & International Class Representatives' Motion for Summary Judgment and Cross-Motion by Trustee for Summary Judgment, including exhibits	Objection – subject to motion to strike as improper expert testimony and untimely disclosure; lack of foundation, lack competence, hearsay

2. Exhibits to be Class Representatives

Ex. No.	Exhibit Description	Objection
D-001	Rebuttal Expert Report Joshua W. Dennis, and all exhibits to the report (July 31, 2020)	
D-002	Supplemental Rebuttal Expert Report Joshua W. Dennis, and all exhibits to the report (April 14, 2023)	
D-003	Affidavit of Frantz Balan dated July 30, 2020	Objection - Hearsay
D-004	Affidavit of Lusette Balan dated July 29, 2020	Objection - Hearsay
D-005	Affidavit of Ilyas J. Rona dated (ECF No. 443)	Objection - Hearsay
D-006	Stipulation Respecting the Amended Fee Arrangement for Defendants dated January 4, 2022	
D-007	Email string Cameron Freer and Andrew Lizotte dated November 2-3, 2021 - BC002512-18	
D-008	SIG account data for Rosmery Torrico	Objection – Subject to Review
D-009	EPOC data for Rosmery Torrico	Objection – Relevance, see Hoffman Decision[1]
D-010	SIG account data for Ella Maria Reid	Objection – Subject to Review

[1] References to the Hoffman Decision are to Memorandum of Decision on Class Defendants' Motion to Exclude Expert Witness Testimony of Timothy Martin [Adv. 16-04007, doc. 536], June 22, 2021, at pp. 38-39.

Ex. No.	Exhibit Description	Objection
D-011	EPOC data for Ella Maria Reid	Objection – Relevance, see Hoffman Decision
D-012	SIG account data for Benjamin Argueta	Objection – Subject to Review
D-013	SIG account data Amilcar Lopez	Objection – Subject to Review
D-014	Lopesa Services Advertisement appearing in La Planeta (4/12/2012)	Objection – Hearsay; Foundation
D-015	"claim_statement" Table	Objection – Subject to Review
D-016	Exhibit 1 to Freer Deposition - Curriculum Vitae of Cameron Freer	
D-017	Exhibit 3 to Freer Deposition - E-mail Chain, Sorondo to Freer, 7/10/21	
D-018	Exhibit 4 to Freer Deposition - E-mail Chain, Sorondo to Freer, 7/18/21	
D-019	Exhibit 5 to Freer Deposition - E-mail Chain, Sorondo to Freer, 7/13/21	
D-020	Exhibit 6 to Freer Deposition - E-mail Chain, Freer to Sorondo, 7/13/21	
D-021	Exhibit 7 to Freer Deposition - E-mail Chain, Sorondo to Freer, 7/14/21	
D-022	Exhibit 8 to Freer Deposition - E-Mail Chain, Lizotte to Freer, 11/3/21	
D-023	Exhibit 9 to Freer Deposition - E-mail Chain, Lizotte to Freer, 11/3/21	
D-024	Transcript of Video Evidentiary Hearings: Determining the Admissibility and Presumptive Effect of the Aggregation Methodology in Determining Net Winners before The Honorable Melvin S. Hoffman, J.U.S.B.C. (Volume 1 - 11/23/2020)	Objection – Subject to identification of proposed excerpts

Ex. No.	Exhibit Description	Objection
D-025	Transcript of Video Evidentiary Hearings: Determining the Admissibility and Presumptive Effect of the Aggregation Methodology in Determining Net Winners before The Honorable Melvin S. Hoffman, J.U.S.B.C. (Volume 2- 11/24/2020)	Objection – Subject to identification of proposed excerpt
D-026	Memorandum of Decision on Class Defendants' Motion to Exclude Expert Witness Testimony of Timothy Martin	
D-027	Curriculum Vitae of Joshua W. Dennis	
D-028	List of Documents Considered by Joshua W. Dennis	
D-029	User Accounts and Participants by Entity and Type	Objection – Subject to Review of Proposed Table
D-030	Summary of TelexFree Net Equity by Tier and Transaction Type	Objection – Subject to Review of Proposed Table
D-031	Summary of TelexFree User Accounts and Participants by Tier	Objection – Subject to Review of Proposed Table
D-032	Summary of TelexFree Top Net Losers Matched to Net Winners	Objection – Subject to Review of Proposed Table
D-033	Top 100 TelexFree Net Losers	Objection – Subject to Review of Proposed Table
D-034	Top 100 TelexFree Net Winners	Objection – Subject to Review of Proposed Table
D-035	Top Net Loser and Matched Net Winner User Account Detail	Objection – Subject to Review of Proposed Table

Ex. No.	Exhibit Description	Objection
D-036	Frantz Balan & Lusette Balan User Account Detail	Objection – Subject to Review of Proposed Table
D-037	Alphabet User Account Detail	Objection – Subject to Review of Proposed Table
D-038	Billybob Arbonne User Account Detail	Objection – Subject to Review of Proposed Table
D-039	Lopes & Carreiro User Account Detail	Objection – Subject to Review of Proposed Table
D-040	Zaglia & Ragolia User Account Detail	Objection – Subject to Review of Proposed Table
D-041	Rejane & Paulo Marinho User Account Detail	Objection – Subject to Review of Proposed Table
D-042	Maria Neves User Account Detail	Objection – Subject to Review of Proposed Table
D-043	Sann Devaconcelos User Account Detail	Objection – Subject to Review of Proposed Table
D-044	Oscar Sosa User Account Detail	Objection – Subject to Review of Proposed Table
D-045	Claimed Account Aggregations	Objection – Subject to Review of Proposed Table
D-046	Example Credit Transfer Detail	Objection – Subject to Review of Proposed Table
D-047	Brandon Zagarella affidavit dated 10/25/2020	Objection - Hearsay

Ex. No.	Exhibit Description	Objection
D-048	TelexFree Bankruptcy Petition	
D-049	Exhibit A-1 to Notice of Proposed Resolution of Claim Amount of Claim Filed with Portal: Name of Creditor: Edivaldo Alves Reis Claim Number: 66876-000	Objection – Relevance, see Hoffman Decision
D-050	SIG account data for Edivaldo Reis	Objection – Pending Review
D-051	EPOC data for Edivaldo Reis	Objection – Relevance, see Hoffman Decision
D-052	Peter Christen, Data Matching (2012)	
D-053	SIG account data for Dani Goes	Objection – Pending Review
D-054	American Greed TV Episode: "Billion Dollar Fraud Goes Viral" (excerpts)	Objection – Hearsay; Pending Review of Excerpts

Both parties reserve the right to supplement with additional exhibits. Both parties reserve the right to use other documents for impeachment purposes or as demonstratives, subject to producing all demonstratives to opposing counsel not later than Monday, October 9 at 5:00 pm.

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: October 2, 2023

/s/ Ilyas J. Rona
Ilyas J. Rona (BBO #642964)
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STEPHEN B. DARR, LIQUIDATING TRUSTEE,

By his counsel:

Dated: October 2, 2023

/s/ /s/ Daniel J. Lyne
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