Docket #0625 Date Filed: 10/4/2023

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 REQUEST FOR PRETRIAL CONFERENCE

Relative to *Darr v. Argueta*, Adv. Pro. 16-4006 (the "Domestic Case") and *Darr v. Alecci*, Adv. Pro. 16-4007 (the "International Case"), Stephen B. Darr, Liquidating Trustee,

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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", respectfully request that the Court schedule a final pretrial conference on October 5, 6, or 10. In support thereof, the parties state as follows:

1. The Court has scheduled hearings commencing on October 11, 2023 in connection with the admissibility of the Trustee's expert witness, requests for summary judgment, and related motions.

2. The parties have conferred and have determined that the conduct of the hearings may be facilitated if certain matters respecting witnesses, testimony, and exhibits can be resolved at a pretrial conference prior to October 11, 2023.

Wherefore, the parties request that the Court:

1. Schedule a pretrial conference for October 5, 6, or 10, 2023; and

2. Grant such other relief as is just and proper.

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 4, 2023

/s/Ilyas J. Rona

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

By his counsel:

Dated: October 4, 2023

/s/ Andrew G. Lizotte

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CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on October 4, 2023, I caused a copy of the *Joint Request for Pretrial Conference* to be served electronically through the Court's ECF System upon the registered participants as identified on the Notice of Electronic Filing.

Dated: October 4, 2023

/s/ Andrew G. Lizotte
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