Docket #0657 Date Filed: 5/8/2024

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

CLASS DEFENDANTS' OBJECTIONS TO TRUSTEE'S PROPOSED EXHIBITS

Relative to *Darr v. Argueta*, Adv. Pro. 16–4006 (the "Domestic Case") and *Darr v. Alecci*, Adv. Pro. 16–4007 (the "International Case"), Class Representatives Frantz Balan, Marco Puzzarini, and Sandro Paulo Freitas (the "Class Representatives"), on behalf of

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classes of alleged "net winners" in the "Domestic Case" and the "International Case," Pursuant to the March 8, 2024, Final Pretrial Order [docket no. 506 in A.P. 16-4006], hereby submit their objections to the admissibility of the Trustee's proposed exhibits:

Old Ex. No.	**Exhibit Description**	**Objection**
1 – 34 (*previously provided in last hearing and marked as Exs. 1 – 34*)	Exhibits 1 through 34 previously marked and admitted in connection with the evidentiary hearings held on October 11, 2023; October 12, 2023; and October 30, 2023	To the extent not previously admitted, the Defendants repeat their objections to Defendants' previously proposed exhibits made in the October 2023 Daubert Hearing.

New Ex No.	**Exhibit Description**	**Objection**
1	Affidavit of John S. Soares	
2	Table joining of Freer customer ID field in the aggregation-summary table to the matching rep ID field in the source data table containing a list of 81,681 net winners, the non-public version of Exhibit A to the Sorondo	
3	A list comparing the most frequent names in each cluster to the lowest rep ID, Exhibit B to the Sorondo	
4	Summary of queries to the "back office" to reflect changes in credits as U.S. currency on a one-to-one basis, Exhibit C to the Sorondo Affidavit	
5	TelexFree Demo Video	Objection – Relevance
6	Borelian Clustered Account Details and Net Equity for Benjamin Argueta	
7	Transaction Net Equity Summary for Benjamin Argueta	
8	Third Party Transaction Partners for Benjamin Argueta	
9	Net Equity Transaction Details for Benjamin Argueta	
10	Credit Transaction Summary for Benjamin Argueta	
11	Credit Transfer Partners for Benjamin Argueta	

New Ex No.	Exhibit Description	Objection
12	Credit Transfer Transaction Details for Benjamin Argueta	
13	Argueta Examplar [*sic*] Triangle Invoices, Exhibit 1 marked at the deposition of Benjamin Argueta on March 16, [*sic*]	
14	Argueta Tax Returns, Exhibit 2 marked at the deposition of Benjamin Argueta on March 16, 2023	
15	Benjamin Argueta Banking Records: BARGUETA00001-0175, BARGUETA00180-0372	
16	Borelian Clustered Account Details and Net Equity for Ana R Ramos	
17	Transaction Net Equity Summary for Ana R Ramos	
18	Third Party Transaction Partners for Ana R Ramos	
19	Net Equity Transaction Details for Ana R Ramos	
20	Credit Transaction Summary for Ana R Ramos	
21	Credit Transfer Partners for Ana R Ramos	
22	Credit Transfer Transaction Details for Ana R Ramos	
23	Ramos Bank Statements, Exhibit 1 marked at the deposition of Ana Rosario Ramos Cordon on March 16, [*sic*]	
24	Credit Card Authorization Forms, Exhibit 2 marked at the deposition of Ana Rosario Ramos Cordon on March [*sic*]	
25	Ana R Ramos 2012-2015 Tax Returns: ARAMOS00004-0029	
26	Borelian Clustered Account Details and Net Equity for Amilcar Lopez	
27	Transaction Net Equity Summary for Amilcar Lopez	

New Ex No.	Exhibit Description	Objection
28	Third Party Transaction Partners for Amilcar Lopez	
29	Net Equity Transaction Details for Amilcar Lopez	
30	Credit Transaction Summary for Amilcar Lopez	
31	Credit Transfer Partners for Amilcar Lopez	
32	Credit Transfer Transaction Details for Amilcar Lopez	
33	Deposits, Exhibit 1 marked at the deposition of Amilcar Lopez Garcia on March 16, 2023	
34	Triangle Transaction Graphic, Exhibit 2 marked at the deposition of Amilcar Lopez Garcia on March 16, 2023	
35	Amilcar Lopez 2012-2015 Tax Returns: ALOPEZ00002-0021	
36	Telex Information: ALOPEZ00022-0038	
37	Borelian Clustered Account Details and Net Equity for Bruno Graziani	
38	Transaction Net Equity Summary for Bruno Graziani	
39	Third Party Transaction Partners for Bruno Graziani	
40	Net Equity Transaction Details for Bruno Graziani	
41	Credit Transaction Summary for Bruno Graziani	
42	Credit Transfer Partners for Bruno Graziani	
43	Credit Transfer Transaction Details for Bruno Graziani	
44	Graziani Exemplar Invoices, Exhibit 1 marked at the deposition of Bruno Graziani on March 16, 2023	
45	Bruno Graziani 2011-2015 Tax Returns: BGRAZIANI00004-0093	
46	Profit and Loss Telexfree LLC (January-December 2012)	Objection – Relevance; Hearsay; Foundation; Authenticity
47	Profit and Loss Telexfree LLC (January-December 2013)	Objection – Relevance; Hearsay; Foundation; Authenticity

New Ex No.	Exhibit Description	Objection
48	Triangle Transaction Graphics, Exhibit 1 marked at the deposition of Ivan Alvarenga on February 15, 2023	Objection – Hearsay; Foundation
49	Selected Portions of the Supplemental Rebuttal Expert Report of Joshua W. Dennis	

Respectfully submitted,

FRANTZ BALAN,
FOR HIMSELF AND AS CLASS REPRESENTATIVE ON BEHALF OF ALL DOMESTIC NET WINNERS,

-and-

MARCO PUZZARINI AND
SANDRO PAULO FREITAS,
FOR THEMSELVES AND AS CLASS REPRESENTATIVES ON BEHALF OF ALL INTERNATIONAL NET WINNERS,

By their counsel,

Dated: May 8, 2024

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

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

Dated: May 8, 2024

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