Docket #0659 Date Filed: 5/21/2024

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 CORRESPONDING TO TRUSTEE'S RE-NUMBERED 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. This updated list correlates Defendants' previously submitted objections [docket no. 508 in A.P. 16-4006], with the Trustee's new exhibit numbers reflected in the Pre-Trial Memo on May 15, 2024 [docket no. 506 in A.P. 16-4006]):

Ex. No.	**Exhibit Description**	**Objection**
previously provided in last hearing and marked as Exhibits 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**
35	Affidavit of John S. Soares	
36	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	
37	A list comparing the most frequent names in each cluster to the lowest rep ID, Exhibit B to the Sorondo Affidavit	
38	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	
39	TelexFree Demo Video	Objection – Relevance
40	Borelian Clustered Account Details and Net Equity for Benjamin Argueta	
41	Transaction Net Equity Summary for Benjamin Argueta	
42	Third Party Transaction Partners for Benjamin Argueta	
43	Net Equity Transaction Details for Benjamin Argueta	

Ex. No.	Exhibit Description	Objection
44	Credit Transaction Summary for Benjamin Argueta	
45	Credit Transfer Partners for Benjamin Argueta	
46	Credit Transfer Transaction Details for Benjamin Argueta	
47	Argueta Examplar Triangle Invoices, Exhibit 1 marked at the deposition of Benjamin Argueta on March 16, 2023	
48	Argueta Tax Returns, Exhibit 2 marked at the deposition of Benjamin Argueta on March 16, 2023	
49	Benjamin Argueta Banking Records: BARGUETA00001-0175, BARGUETA00180-0372	
50	Borelian Clustered Account Details and Net Equity for Ana R Ramos	
51	Transaction Net Equity Summary for Ana R Ramos	
52	Third Party Transaction Partners for Ana R Ramos	
53	Net Equity Transaction Details for Ana R Ramos	
54	Credit Transaction Summary for Ana R Ramos	
55	Credit Transfer Partners for Ana R Ramos	
56	Credit Transfer Transaction Details for Ana R Ramos	
57	Ramos Bank Statements, Exhibit 1 marked at the deposition of Ana Rosario Ramos Cordon on March 16, 2023	
58	Credit Card Authorization Forms, Exhibit 2 marked at the deposition of Ana Rosario Ramos Cordon on March	
59	Ana R Ramos 2012-2015 Tax Returns: ARAMOS00004-0029	
60	Borelian Clustered Account Details and Net Equity for Amilcar Lopez	

Ex. No.	Exhibit Description	Objection
61	Transaction Net Equity Summary for Amilcar Lopez	
62	Third Party Transaction Partners for Amilcar Lopez	
63	Net Equity Transaction Details for Amilcar Lopez	
64	Credit Transaction Summary for Amilcar Lopez	
65	Credit Transfer Partners for Amilcar Lopez	
66	Credit Transfer Transaction Details for Amilcar Lopez	
67	Deposits, Exhibit 1 marked at the deposition of Amilcar Lopez Garcia on March 16, 2023	
68	Triangle Transaction Graphic, Exhibit 2 marked at the deposition of Amilcar Lopez Garcia on March 16, 2023	
69	Amilcar Lopez 2012-2015 Tax Returns: ALOPEZ00002-0021	
70	Telex Information: ALOPEZ00022-0038	
71	Borelian Clustered Account Details and Net Equity for Bruno Graziani	
72	Transaction Net Equity Summary for Bruno Graziani	
73	Third Party Transaction Partners for Bruno Graziani	
74	Net Equity Transaction Details for Bruno Graziani	
75	Credit Transaction Summary for Bruno Graziani	
76	Credit Transfer Partners for Bruno Graziani	
77	Credit Transfer Transaction Details for Bruno Graziani	
78	Graziani Exemplar Invoices, Exhibit 1 marked at the deposition of Bruno Graziani on March 16, 2023	
79	Bruno Graziani 2011-2015 Tax Returns: BGRAZIANI00004-0093	

Ex. No.	**Exhibit Description**	**Objection**
80	Profit and Loss Telexfree LLC (January-December 2012)	Objection – Relevance; Hearsay; Foundation; Authenticity
81	Profit and Loss Telexfree LLC (January-December 2013)	Objection – Relevance; Hearsay; Foundation; Authenticity
82	Triangle Transaction Graphics, Exhibit 1 marked at the deposition of Ivan Alvarenga on February 15, 2023	Objection –Hearsay; Foundation
83	Selected Portions of the Supplemental Rebuttal Expert Report of Joshua W. Dennis	

Dated: May 21, 2024

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,

/s/ Michael J. Duran

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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 21, 2024

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