UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:

TELEXFREE, LLC, TELEXFREE, INC. and TELEXFREE FINANCIAL, INC.,

Debtors.

STEPHEN DARR, LIQUIDATING TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS.

Plaintiff,

v.

CARLOS WANZELER, et al Defendants.

Chapter 11 Cases

14-40987-MSH 14-40988-MSH 14-40989-MSH

Substantively Consolidated

Adversary Proceeding No. 16-4032

MOTION BY TRUSTEE TO APPROVE STIPULATION OF SETTLEMENT BETWEEN THE LIQUIDATING TRUSTEE AND JAMES MERRILL

Stephen B. Darr, the duly appointed Liquidating Trustee (the "Trustee") of the substantively consolidated bankruptcy estates ("Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors" or "TelexFree"), respectfully requests that the Court approve the attached Stipulation of Settlement ("Stipulation") by and between the Trustee and James Merrill ("Merrill"), in accordance with Federal Rule of Bankruptcy Procedure 9019. The Stipulation will resolve the estate's claims against Merrill, a principal of TelexFree, for an agreed judgment in the amount of \$3,000,000. In further support of this motion, the Trustee states as follows:

