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 RESPECTING KATIA WANZELER AND RELATED PARTIES

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 Stipulation of Settlement filed herewith (the "Stipulation") by and among the Trustee, the Faith Nominee Realty Trust ("FNR Trust"), Forever Diamond Realty, LLC, and Katia Wanzeler (collectively, the "Parties") pursuant to Federal Rule of Bankruptcy Procedure 9019.

BACKGROUND

On April 13, 2014 (the "Petition Date"), the Debtors filed voluntary Chapter 11 1. petitions with the United States Bankruptcy Court for the District of Nevada.

