

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION**

**In Re:**

**TELEXFREE, LLC ,  
TELEXFREE, INC.,  
TELEXFREE FINANCIAL, INC.,**

**Debtors.**

**Chapter 11**

**Case No. 14-40987-MSH**

**Case No. 14-40988-MSH**

**Case No. 14-40989-MSH**

**Jointly Administered**

**MOTION BY STEPHEN B. DARR, CHAPTER 11 TRUSTEE, TO  
CONDUCT RULE 2004 EXAMINATION OF BABENER & ASSOCIATES**  
*(Expedited Determination Requested)*

Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates (the "Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), respectfully moves for the entry of an order authorizing the Trustee to issue subpoenas upon and to obtain Documents, as defined in Exhibit "A" hereto, relating to the Debtors from Babener & Associates ("Babener") all in accordance with Federal Rule of Bankruptcy Procedure 2004. Upon information and belief, Babener acted as counsel to the Debtors in the conduct of their multi-level marketing program, and likely has relevant information with respect to the Debtors' businesses and business model. Obtaining these documents from Babener will aid the Trustee in his continuing investigation into the Debtors' financial affairs.

In further support of this motion, the Trustee states as follows:



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