

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
GERALD P. NEHRA AND THE LAW OFFICES OF NEHRA & WAAK**
(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 Gerald P. Nehra and the Law Offices of Nehra & Waak (collectively, "Nehra") all in accordance with Federal Rule of Bankruptcy Procedure 2004. Upon information and belief, Nehra acted as prepetition counsel to the Debtors with respect to their multi-level marketing program, and likely has relevant information with respect to the Debtors' businesses and business model. Obtaining these documents from Nehra 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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07/10/2014 ALLOWED. NO OBJECTIONS FILED.

Stephen B. Darr