Case 14-40987 Doc 339

Filed 07/10/14 Fatarad 0 Document Page 1 of 1

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

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In Re:

TELEXFREE, LLC , TELEXFREE, INC., TELEXFREE FINANCIAL, INC., Chapter 11

Case No. 14-40987-MSH Case No. 14-40988-MSH Case No. 14-40989-MSH

Debtors.

Jointly Administered

MOTION BY STEPHEN B. DARR, CHAPTER 11 TRUSTEE, TO CONDUCT RULE 2004 <u>EXAMINATION OF JOELE FRANK, WILKINSON, BRIMMER, KATCHER</u> (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 Joele Frank, Wilkinson, Brimmer, Katcher ("Joele Frank") all in accordance with Federal Rule of Bankruptcy Procedure 2004. Upon information and belief, Joele Frank provided public relations and investor relations services to the Debtors both prepetition and postpetition. The proposed examination is part of the Trustee's continuing investigation into the Debtors' financial affairs.

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

JURISDICTION

1. This Court has jurisdiction over this motion under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

