

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

Docket #0341 Date Filed: 7/10/2014

In re:

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

Debtors.

Chapter 11

Case No. 14-40987-MSH

Case No. 14-40988-MSH

Case No. 14-40989-MSH

Jointly Administered

**MOTION TO APPROVE STIPULATED ORDER RESPECTING MOTION OF  
STEPHEN B. DARR, CHAPTER 11 TRUSTEE, TO CONDUCT RULE 2004  
EXAMINATION OF INTERNATIONAL PAYOUT SYSTEMS, INC.,**

Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors") hereby moves for the approval of the stipulated order [docket no. 332] (the "Stipulated Order") by the Trustee and International Payout Systems, Inc. ("IPS" and with the Trustee, the "Parties") with respect to the *Motion by Stephen B. Darr, Chapter 11 Trustee, to Conduct Rule 2004 Examination of Global Payroll Gateway, Inc., International Payout Systems, Inc., Propay, Inc., Propay.com, Argus Payments, and Allied Wallet* [docket no.305] (the "Motion") and states as follows:

1. Upon information and belief, IPS was one of several payment processors utilized by the Debtors to utilized to, among other things, pay commissions and other forms of compensation or reimbursement to participants in their multi-level marketing program.

2. The Motion seeks, among other things, the production of documents by IPS to assist in the Trustee's investigation of the Debtors' businesses and enhance his understanding of the Debtors' receipts and disbursements.

