

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS CENTRAL DIVISION

)	
)	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 CIAO TELECOM, INC.**

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 a subpoena upon and to obtain Documents, as defined in Exhibit "A" hereto, relating to the Debtors from Ciao Telecom, Inc. ("Ciao") all in accordance with Federal Rule of Bankruptcy Upon information and belief, the Debtors and/or one of their principals may have Procedure 2004. made a substantial investment in Ciao shortly before the bankruptcy filings and the Trustee requires this examination to further investigate any financial connections that Ciao may have to the Debtors.

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

JURISDICTION

- This Court has jurisdiction over this motion under 28 U.S.C. §§ 157 and 1334. This 1. 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.
- The basis for the relief requested in this motion is Rule 2004 of the Federal Rules of 2. Bankruptcy Procedure.

