

## UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:

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

Debtors.

STEPHEN DARR, AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF EACH OF THE DEBTORS,

Plaintiff,

ν.

JOELE FRANK WILKINSON BRIMMER KATCHER,

Defendant.

Chapter 11 Cases

14-40987-MSH 14-40988-MSH 14-40989-MSH

Jointly Administered

Adversary Proceeding No. 16-4036

## MOTION BY TRUSTEE TO APPROVE STIPULATION OF SETTLEMENT BETWEEN CHAPTER 11 TRUSTEE AND JOELE FRANK, WILKINSON, BRIMMER, KATCHER

Stephen B. Darr, the duly appointed Chapter 11 Trustee (the "Trustee") of the bankruptcy estates ("Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), respectfully requests that the Court approve the stipulation ("Stipulation") filed herewith by and between the Trustee and Joele Frank, Wilkinson, Brimmer, Katcher ("Joele Frank"), pursuant to Federal Rule of Bankruptcy Procedure 9019. The Stipulation provides for a payment into the Estates of \$20,000, a release by the Trustee in favor of Joele Frank, and the waiver by Joele Frank of approximately \$60,000 in claims. In support of this motion, the Trustee states as follows:

