

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,

v.

ADVENT COMMUNICATIONS  
CORPORATION,

Defendant.

Chapter 11 Cases

14-40987-MSH

14-40988-MSH

14-40989-MSH

Jointly Administered

Adversary Proceeding  
No. 16-4026

**MOTION BY THE TRUSTEE TO STAY PROCEEDINGS IN THE ABOVE-  
CAPTIONED ADVERSARY PROCEEDING PENDING RESOLUTION  
OF THE CRIMINAL ACTION AGAINST JAMES MERRILL**

Stephen B. Darr, as he is Trustee (the "Trustee") of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), moves that this Court enter an order staying any further proceedings in the above-captioned Adversary Proceeding (the "Adversary Proceeding") pending a resolution of the Criminal Action brought by The United States of America against James Merrill and another,<sup>1</sup> captioned *United States v. Merrill*, 14-CR-40028-TSH (the "Criminal Action"). The Criminal Action is currently scheduled for trial in the fall of 2016. The Trustee seeks this stay at the request of the United

<sup>1</sup> The other defendant is Carlos Wanzeler, who is currently a fugitive living in Brazil, and he has not appeared in the Criminal Action.

