

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

In re:

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

Debtors.

Chapter 11 Cases

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

Jointly Administered

STEPHEN DARR AS HE IS THE TRUSTEE  
OF THE CHAPTER 11 ESTATES OF  
TELEXFREE, LLC, TELEXFREE, INC. and  
TELEXFREE FINANCIAL, INC.,

Plaintiff,

Adv. Proc. No. 16-4019

v.

TELEXELECTRIC, LLLP,  
TELEXELECTRIC LP,  
SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Defendants,

and

SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Reach and Apply/Trustee Defendants.

**NOTICE OF PROPOSED ORDER APPROVING MOTION BY TRUSTEE TO  
APPROVE SETTLEMENT AGREEMENT (SUNWIND ENERGY ET AL)**



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Stephen B. Darr, the duly appointed Chapter 11 Trustee of the bankruptcy estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc., respectfully submits this proposed *Order Approving Motion by Trustee to Approve Settlement Agreement (Sunwind Energy et al)*. This matter relates to docket number 761 in the main case scheduled for hearing on July 27, 2016.

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

/s/ Andrew G. Lizotte  
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Dated: July 19, 2016  
712518

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v.

TELEXELECTRIC, LLLP,  
TELEXELECTRIC LP,  
SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Defendants,

and

SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Reach and Apply/Trustee Defendants.

**ORDER APPROVING MOTION BY TRUSTEE TO APPROVE SETTLEMENT  
AGREEMENT (SUNWIND ENERGY ET AL)**

This matter having come before the Court on this \_\_\_\_ day of July, 2016 on the motion (“Motion”) by 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”), to approve the settlement agreement (“Agreement”) by and between the Trustee and Sunwind Energy Doyle North LLC, Sunwind Energy Solutions LLLP, and Sunwind Energy Group LLLP (collectively, “Sunwind”), all parties in interest having been notified, and a statement having been filed by the Plaintiffs’ Interim Executive Committee, it is hereby ORDERED that:

1. The Motion is approved, subject to the terms herein.
2. While the Trustee shall retain no causes of action against Sunwind, nothing contained in the Agreement shall impair, release, or discharge claims that have been or could be asserted, whether or not such claims have to date been asserted, by the plaintiffs in the multi-district litigation pending in the United States District Court for the District of Massachusetts, *captioned* In re TelexFree Securities Litigation, MDL No. 4:14-md-2566- TSH. For the avoidance of doubt, the Trustee agrees he shall not attempt to assert any claims or causes of action against Sunwind in this multi-district litigation or otherwise. Nothing in this release grants the plaintiffs in the multi-district litigation any claims or causes of action that they would otherwise not have absent the Agreement.

Dated: July \_\_, 2016

\_\_\_\_\_  
Hon. Melvin S. Hoffman  
Chief United States Bankruptcy Judge

712124

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

In re:

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TELEXELECTRIC, LLLP,  
TELEXELECTRIC LP,  
SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Defendants,

and

SUNWIND ENERGY DOYLE NORTH LLC,  
SUNWIND ENERGY SOLUTIONS DOYLE  
NORTH, LLC, SUNWIND ENERGY  
SOLUTIONS LLLP, and SUNWIND ENERGY  
GROUP LLLP,

Reach and Apply/Trustee Defendants.

**CERTIFICATE OF SERVICE**

I, Andrew G. Lizotte, hereby certify that I have this day served a copy of the Notice of Proposed Order Approving Motion by Trustee to Approve Settlement Agreement (Sunwind Energy, et al) via this Court's CM/ECF System, by Electronic Mail, and by First Class Mail, Postage Prepaid to the attached service list as indicated.

/s/ Andrew G. Lizotte  
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Dated: July 19, 2016  
710212

Telexfree, LLC  
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