

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,

ALC TO A COURT OF THE PARTY OF

HANNA-SHEA CONSULTING, LLC,

Defendant.

Chapter 11 Cases

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

Jointly Administered

Adversary Proceeding No. 16-4028

MOTION BY TRUSTEE TO APPROVE STIPULATION OF SETTLEMENT BETWEEN CHAPTER 11 TRUSTEE AND HANNA SHEA CONSULTING, LLC

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 Hanna-Shea Consulting, LLC ("Hanna"), pursuant to Federal Rule of Bankruptcy Procedure 9019. The Stipulation provides for a release by Hanna of approximately \$20,000 in claims. In support of this motion, the Trustee states as follows:



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