UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:

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

Debtors.

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

Plaintiff,

V.

OPT 3 SOLUTIONS, INC. AND JAY BORROMEI,

Defendant(s).

Chapter 11 Cases

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

Jointly Administered

Adversary Proceeding No.16-4034-MSH

MOTION FOR ENTRY OF DEFAULT

Stephen B. Darr, as he is the Trustee (the "Trustee") of the Chapter 11 estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), moves pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, as incorporated herein by Rule 7055 of the Rules of Bankruptcy Procedure, that the Defendant Opt 3 Solutions, Inc. ("Opt 3") be defaulted for failure to answer or otherwise defend this action.