Meloni & Hoffman

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.

ISG TELECOM CONSULTANTS, LLC,

Defendant.

Chapter 11 Cases

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

Jointly Administered

Adversary Proceeding No. 16-4029

MOTION BY TRUSTEE TO APPROVE SETTLEMENT AGREEMENT AMONG CHAPTER 11 TRUSTEE, ISG TELECOM CONSULTANTS, LLC, <u>AND JOSEPH ISAACS</u>

Stephen Darr, the duly appointed Chapter 11 Trustee (the "<u>Trustee</u>") of TelexFree, LLC, TelexFree, Inc. and TelexFree Financial, Inc. ("<u>TelexFree</u>" or the "<u>Debtors</u>"), respectfully requests that the Court approve the settlement agreement ("<u>Stipulation</u>") filed herewith by and among the Trustee, ISG Telecom Consultants, LLC ("<u>ISG</u>"), the Defendant herein, and Joseph Isaacs the principal of ISG ("<u>Isaacs</u>"). The Stipulation provides for a payment by ISG of \$50,000 in settlement of the claims asserted in this action. In support of this motion, the Trustee states as follows:

