## 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 BY PLAINTIFF FOR ENTRY OF JUDGMENT

Pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rule 7055 of the Federal Rules of Bankruptcy Procedure, Stephen B. Darr (the "Trustee"), as chapter 7 trustee of the bankruptcy estates of TelexFree LLC, TelexFree, Inc., and TelexFree Financial, Inc., and the Plaintiff herein, hereby submits this motion (the "Motion") for entry of default judgment against the Defendant, Opt 3 Solutions, Inc. (the "Opt 3"). A proposed Judgment is attached to this Motion as Exhibit A. In further support of this Motion, the Plaintiff respectfully states as follows:

