

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,

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CRAFT FINANCIAL SOLUTIONS, LLC, CRAFT TRUST FINANCIAL, LLC a/k/a CRAFT TRUST SERVICES, LLC, JOSEPH CRAFT,

Defendant.

Chapter 11 Cases

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

Jointly Administered

Adversary Proceeding No. 16-4035

MOTION BY TRUSTEE TO APPROVE STIPULATION OF SETTLEMENT AMONG CHAPTER 11 TRUSTEE AND CRAFT FINANCIAL SOLUTIONS, CRAFT TRUST FINANCIAL AND JOSEPH CRAFT

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 among the Trustee and Craft Financial Solutions, LLC ("CFS"), Craft Trust Financial, LLC, a/k/a Craft Trust Services, LLC ("CTF") and Joseph Craft ("Craft" and, together with CFS and CTF, the "Defendants"), pursuant to Federal Rule of

