

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

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

Debtors.

Chapter 11

Case No. 14-40987-MSH

Case No. 14-40988-MSH

Case No. 14-40989-MSH

Jointly Administered

**RESPONSE BY CHAPTER 11 TRUSTEE TO FIRST INTERIM APPLICATION FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF MILLIGAN RONA
DURAN & KING AS CLASS COUNSEL TO THE DEFENDANT CLASS**

To the Honorable Melvin S. Hoffman, Chief United States Bankruptcy Judge:

Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates (the "Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors" or "TelexFree"), respectfully files this response to the First Interim Application for Compensation and Reimbursement of Expenses of Milligan Rona Duran & King ("MRDK") as Class Counsel to the Defendant Class (the "Application").

1. On October 6, 2016, the Court entered an order in adversary proceeding no. 16-4006 (the "Certification Order") certifying the defendant class of net winners residing in the United States and appointing MRDK as class counsel [Adv Proc No 16-4006, docket entry 194].

2. The Certification Order provides that the "Trustee is authorized to utilize estate funds in an aggregate amount not to exceed Two Hundred and Twenty Five Thousand Dollars (\$225,000) to pay Class Counsel for legal fees and costs incurred by Class Representative" subject to submission of an application for compensation and Court approval. Certification Order, at ¶7.



3. The Trustee has no objection to the allowance and payment of the fees and expenses sought in the Application, provided that any payment made by the Trustee from estate funds be applied against the maximum contribution from the estate as set forth in the Certification Order.

STEPHEN B. DARR, CHAPTER 11 TRUSTEE,
By his attorneys,

/s/ Andrew G. Lizotte

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Dated: September 7, 2017
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In Re:	)	
	)	
	)	Chapter 11
	)	
TELEXFREE, LLC ,	)	Case No. 14-40987-MSH
TELEXFREE, INC.,	)	Case No. 14-40988-MSH
TELEXFREE FINANCIAL, INC.,	)	Case No. 14-40989-MSH
	)	
Debtors.	)	Jointly Administered
	)	

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that I have this day caused to be served a copy of the
*Response by Chapter 11 Trustee to First Interim Application for Compensation and
Reimbursement of Expenses of Milligan Rona Duran & King as Class Counsel to the Defendant
Class* via operation of this Court's CM/ECF System, by electronic mail and/or by first class mail,
postage prepaid to the attached service list as indicated.

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