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
)

MOTION TO LIMIT SERVICE ON MOTION BY CHAPTER 11 TRUSTEE FOR AUTHORITY TO SELL REAL PROPERTY BY PRIVATE SALE, FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES (N. FLAGLER DRIVE)

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 moves that this Court enter an order limiting the scope of service in connection with a proposed sale of a residential condominium unit. In support thereof, the Trustee asserts as follows:

Background

- 1. On April 13, 2014 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Nevada.
- 2. The Debtors initially operated as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.