

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 *Notice of Intended Private Sale, Deadline for Objections and Counteroffers, and Final Hearing 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)* 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.

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108
Telephone: (617) 423-0400
Facsimile: (617) 423-0498
Email: ALizotte@murphyking.com

Dated: November 10, 2017
735081



1440987171110000000000001

Telexfree, LLC
Short Service List
#670980

BY ECF:

- Charles R. Bennett cbennett@murphyking.com,
bankruptcy@murphyking.com;imccormack@murphyking.com
- Kendra Berardi kberardi@rc.com, mjewell@rc.com
- Deena R. Bernstein bernsteind@sec.gov, #brodocket@sec.gov
- Roger Bertling roger@bertlinglaw.com, rbertlin@law.harvard.edu
- Robert J. Bonsignore rbonsignore@class-actions.us, jnewlon@class-actions.us
- C. Elizabeth Brady Murillo emurillo@burnslev.com
- Alan L. Braunstein abraunstein@riemerlaw.com, ahall@riemerlaw.com
- Douglas Brooks dbrooks@libbyhoopes.com
- Orestes G. Brown obrown@metaxasbrown.com
- Evans J. Carter ejcatty1@verizon.net
- Brian Casaceli bcasaceli@mirickoconnell.com
- John Commisso john.commisso@jacksonlewis.com,
ann.macdonald@jacksonlewis.com
- Christopher M. Condon cmc@murphyking.com, imccormack@murphyking.com
- Jonathan Crafts jcrafts@dwyer-llc.com
- Gary W. Cruickshank gwc@cruickshank-law.com
- Edward Dangel tdangel@dangeldwyer-llc.com
- Ronald A. Dardeno rdardeno@dardeno.com
- Joseph P. Davis davisjo@gtlaw.com, ponsettoj@gtlaw.com
- Christine E. Devine cdevine@mirickoconnell.com, bankrupt@mirickoconnell.com
- Adam K. Doerr adoerr@rbh.com,
akelly@robinsonbradshaw.com,fbarringer@robinsonbradshaw.com
- Martin B. Dropkin nmatza@hotmail.com,
nastor@dropkinmatza.com;mdropkin@dropkinmatza.com
- Daniel Dullea scott@goldberganddullea.com
- Timothy J. Durken tdurken@jagersmith.com,
bankruptcy@jagersmith.com;tdurken@ecf.inforuptcy.com
- James P. Ehrhard ehrhard@ehrhardlaw.com, cote@ehrhardlaw.com
- John C. Elstad jelstad@verilldana.com
- Kate P. Foley kfoley@mirickoconnell.com
- Robert W. Fuller rfuller@rbh.com
- Andrew J. Gallo andrew.gallo@bingham.com, brian.katz@morganlewis.com
- Stuart M. Glass sglass@choate.com
- Valentin D. Gurvits vgurvits@bostonlawgroup.com
- William J. Hanlon whanlon@seyfarth.com, bosdocket@seyfarth.com
- Carol E Head carol.head@morganlewis.com
- Lawrence P. Heffernan lheffernan@rc.com, kberardi@rc.com

- Nellie E Hestin nhestin@mcguirewoods.com, mkrizan@mcguirewoods.com; aauld@mcguirewoods.com; kdevyver@mcguirewoods.com
- Jonathan Horne jhorne@murthalaw.com
- Franklin C. Huntington huntingtonf@sec.gov
- Vernon C. Jolley jolleylaw@comcast.net
- Paul V. Kelly paul.kelly@jacksonlewis.com
- Nicholas R. Kennedy nkennedy@mcguirewoods.com, bsieg@mcguirewoods.com; khosmer@mcguirewoods.com
- Richard King USTPRegion01.WO.ECF@USDOJ.GOV
- Richard T. King richard.t.king@usdoj.gov
- Andrew G. Lizotte agl@murphyking.com, bankruptcy@murphyking.com; pas@murphyking.com; ddk@murphyking.com; agl@murphyking.com
- Danielle Andrews Long dlong@rc.com, jsantiago@rc.com
- Michael M. McArdle mike@mcardlelaw.com, morgan@mcardlelaw.com
- S. Elaine McChesney Elaine.mcchesney@bingham.com
- Wendy M. Mead wendymeadpc@verizon.net
- Harold B. Murphy bankruptcy@murphyking.com, ddk@murphyking.com
- Michael K. O'Neil moneil@murphyking.com, dkonusevska@murphyking.com
- F. Anthony Paganelli tony@paganelligroup.com
- Carmenelisa Perez-Kudzman carmenelisa@pklolaw.com, evan@pklolaw.com
- James Radke jradke@murthalaw.com, lmulvehill@murthalaw.com
- David P Reiner II dpr@reinerslaw.com, eservice@reinerslaw.com
- Ian D. Roffman iroffman@nutter.com, epleadings@nutter.com; cfeldman@nutter.com; kcannizzaro@nutter.com
- Ilyas J. Rona ijr@milliganrona.com, gnc@milliganrona.com
- Mark C. Rossi bostonian.ecf@gmail.com, Esher.RossiECF2@gmail.com
- Paul S. Samson psamson@riemerlaw.com, ahall@riemerlaw.com
- Kenneth I. Schacter kenneth.schacter@bingham.com
- Hilary Schultz hschultz@engelschultz.com
- Ari M. Selman ari.selman@bingham.com
- Jordan L. Shapiro JSLAWMA@aol.com
- Matthew Shayefar matt@bostonlawgroup.com
- Monica Snyder msnyder@murthalaw.com, jbabula@murthalaw.com
- Lisa D. Tingue lisa.d.tingue@usdoj.gov
- Joseph Toomey jtoomey@nutter.com
- Thomas S. Vangel tvangel@murthalaw.com
- Sarah W. Walsh sarah.walsh@jacksonlewis.com
- Elton Watkins watkinslaw@comcast.net
- Jason C. Weida jweida@jonesday.com

By Electronic Mail: Top 30

Joselia Sangali	jozelia_miriam@hotmail.com
Leonardo Francisco	leocaul@hotmail.com
DL1, Inc.	davidbeebe@gmail.com
Renato Alves	renato.alves.88@hotmail.com
Benjamin Argueta	benjamin_Gauchao@yahoo.com
Marco Almeida	marcobrum53@hotmail.com
JMC, Inc.	marcosclubflorida@gmail.com
Edwin H.M Lima	aldemar.neto@ac.gov.br
David Martinez	dmj500@charter.net
Paola Zollo Alecci	paolazollo3@gmail.com
Robert Bourguignon	flavioarraz@gmail.com
Carla Peres	carlagperes@outlook.com
Pedro Taveras	ptc59@hotmail.com
Nathana Santos Reis	nathanasreis@gmail.com
Jose Anominondas	wjempreendimentos@icloud.com
Vagner Roza	vagnerflamengo2009@hotmail.com
Norberto Rey	reytrucking@yahoo.com
Jose Carlos Maciel	jcmkkgb@hotmail.com
Bruno Graziani	graziani8926@gmail.com
Renato Ribeiro	renatousa05@gmail.com
Marcelino Salazar Bacilio	marcelino@sb@outlook.com
Edison O.J. Aleman	oswaldojuradoaleman@gmail.com
Roman Mishuk	mishuknew@gmail.com
Rosa M.C. Souto	telexfree.r@hotmail.com
Du Painting	edpnegocios@hotmail.com
Graca Luisa Andrade	projectosfx@gmail.com
Paulo Francisco da Silva	avpaulo_207@hotmail.com
Leone da Silva Santos	araujommn@gmail.com
David Fine, Esq.	dfine@kslaw.com
Craig Dunlap, Esq.	cdunlap@fclaw.com , tnealon@fclaw.com
Opt3 Solutions, Inc.	infor@opt3.com

BY ELECTRONIC MAIL: APPEARANCES

Ihuoma Igboanugo (for Maduako C. Ferguson, Sr. et al)
The Crescent Law Practice
P.O. Box 41333
Raleigh, NC 27692
919-389-6963
thecrescentlaw@gmail.com

Timothy S. Cory (for Ismail Karatekin) and (for Leonardo Barros Pereira)
Durham Jones & Pinegar
10785 W. Twain Ave., Ste 200
Las Vegas, NV 89135
(702) 870-6060
(702) 870-6090 (fax)
tcory@djplaw.com

Jonathan Horne (for Opt3 Solutions, Inc.)
Jager Smith P.C.
One Financial Center 4th Fl.
Boston, MA 02111
617.951.0500
jhorne@jagersmith.com

Douglas Brooks (for Propay, Inc.)
LibbyHoopes
399 Boylston Street
Boston, MA 02116
617-338-9300
dbrooks@libbyhoopes.com

William Baldiga, Esq. (for Plaintiffs' Interim Executive Committee)
Jill C. Wexler, Esq.
Kellie Fisher, Esq.
Brown Rudnick
One Financial Center
Boston MA 02111
wbaldiga@brownrudnick.com
jwexler@brownrudnick.com
kfisher@brownrudnick.com

D. Michael Noonan, Esq. (for Plaintiffs' Interim Executive Committee)
Shaheen & Gordon PA
140 Washington Street
Dover NH 03821
mnoonan@shaheengordon.com

R. Alexander Saveri, Esq. (for Plaintiffs' Interim Executive Committee)
Saveri & Saveri, Inc.
706 Sansome St.
San Francisco CA 94111
rick@saveri.com

William L. Coulthard, Esq. (for Plaintiffs' Interim Executive Committee)
Kemp Jones & Coulthard, LLP
Wells Fargo Tower
3800 Howard Hughes Parkway
17th Floor
Las Vegas NV 89169
w.coulthard@kempjones.com

Neil Gallagher
USAMA
Neil.Gallagher@usdoj.gov

Cory Flashner
USAMA
Cory.Flashner@usdoj.gov

BY FIRST CLASS MAIL: APPEARANCES

Maria J. Diconza, Esq., Nancy A. Mitchell, Esq.
& Matthew Hinker, Esq.
Greenberg Traurig, Llp
Metlife Building
200 Park Ave
New York, NY 10166

Stephen Darr
Huron Consulting Services, LLC
100 High Street, 23rd Floor
Boston MA 02110

Thomas H. Fell, Esq., Gregory Garman, Esq.
Gordon Silver
3960 Howard Hughes Pky, 9th Flr
Las Vegas, NV 89169

Richard F. Holley, Esq.
400 S. Fourth St., 3rd Floor
Las Vegas, NV 89101

Evan J. Gershbein & Drake D. Foster
Kurtzman Carson Consultants LLC
2335 Alaska Avenue
El Segundo, CA 90245

Sandra W. Lavigna
U. S. Securities And Exchange Comm.
5670 Wilshire Blvd, 11th Flr
Los Angeles, CA 90036

Teresa M. Pilatowicz, Esq., Mark M. Weisenmiller, Esq.
Gordon Silver, Ltd.
3960 Howard Hughes Pkwy, 9th Flr
Las Vegas, NV 89169

David L. Neale, Esq.
Levene, Neale, Bender, Yoo & Brill Llp
10250 Constellation Blvd., Suite 1700
Los Angeles, Ca 90067

Roger W Wenthe
United States Attorney
333 Las Vegas Blvd So, #5000
Las Vegas, Nv 89101

Securities and Exchange Commission
Boston District Office
33 Arch Street, 23rd Floor
Boston MA 02110

Internal Revenue Service
Special Procedures Function
STOP 2080, P.O. Box 9112
25 New Sudbury St., JFK Federal Bldg.
Boston MA 02203

Carmen Milagros Ortiz
United States Attorney
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston MA 02210

Securities and Exchange Commission
100 F Street, N.E.
Washington DC 20549

Commonwealth of Massachusetts
Division of Unemployment Assistance
Executive Office of Labor & Workplace Develop.
19 Staniford St., Hurley Bldg.
Boston MA 02114

Commonwealth of Mass/DOR
Bankruptcy Unit, P.O. Box 9564
100 Cambridge Street, 7th floor
Boston MA 02114-9564

Loretta E. Lynch
Attorney General of The United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington DC 2053-0001

Office of the Attorney General
Commonwealth of MA
Consumer Protection Division
One Ashburton Place, 19th Floor
Boston MA 02108

Massachusetts Department of Revenue
Bankruptcy Unit
PO Box 9564
Boston, MA 02114-9564

Internal Revenue Service
PO Box 21126
Philadelphia PA 19114

William H. Runge, III
Alvarez & Marshal North America, LLC
Monarch Tower,
3424 Peachtree Road, NE, #1500
Atlanta GA 30326

Daniel M. Feigenbaum, Esq.
Deputy General Counsel
Alvarez & Marshal Holdings, LLC
600 Madison Avenue
New York, NY 10022

Internal Revenue Service
Centralized Insolvency Operation
PO Box 7346
Philadelphia PA 19101-7346

Internal Revenue Service
Centralized Insolvency Operation
2970 Market Street
Philadelphia PA 19104

Internal Revenue Service
500 N. Capital St., NW
Washington DC 20221

Stuart MacMillan
Chairman and Managing Partner
Impact This Day, Inc.
126 3rd Avenue North, Suite 206
Safety Harbor, FL 34695

Massachusetts Securities Division
William Neelon, Esq.
Enforcement Section
One Ashburton Place, Room 1701
Boston MA 02108

Joele Frank
Wilkinson Brimmer Katcher
622 Third Avenue, 36th Floor
New York, NY 10017

Lee A Armstrong, Esq.
222 E. 41st Street
New York, NY 10017

The Sheffield Group
2239 N. Hayden Road
Suite 103
Scottsdale AZ 85257

Lane Powell
601 S.W. Second Avenue
Suite 2100
Portland OR 97204

Legal Services Center
Roger Berling
122 Boylston Street
Jamaica Plain, MA 02130

Telecom Logic, LLC
818 SW 3rd Avenue
Suite 137
Portland OR 97204

Rodman, Rodman & Sandman
Richard Sandman
442 main Street, Suite 300
Malden MA 02148

Cotton Driggs Walch Holley Woloson & Thompson
Richard Holley Ogonna Atamoh
400 S. 4th Street, 3rd floor
Las Vegas, NV 89101

Babener & Associates
121 SW Morrison, Suite 1020
Portland OR 97204

Lee M Pollack
Law Firm of Jones Day
222 E. 41st Street
New York, NY 10017

Richard W. Waak
11300 East Shore Drive
Delton MI 49046

Telexfree
Stuart MacMillan
225 Cedar Hill St., Suite 200
Marlborough MA 01752

PayPal Worldwide Operations
12312 Port Grace Blvd
La Vista Nebraska 68128

Gerald P. Nehra
1710 Beach Street
Muskegon MI 49441-1008

International Payout Systems Inc.
2500 E. Hallandale Beach Blvd.
Suite 800
Hallandale Beach FL 33009

PayPal Corporate Headquarters
2211 North First Street
San Jose, CA 95131

Argus Payments Inc.
220 Humboldt Court
Sunnyvale CA 94089

Global Payroll Gateway, Inc.
18662 MacArthur Blvd.
Suite 200
Irvine CA 92612

Allied Wallet
1 Northcumberland Avenue
Trafalgar Square
LONDON, WC2N 5BW
UNITED KINGDOM

ProPay Inc.
3400 N. Ashton Blvd.
Suite 200
Lehi, UT 84043

Garvey Schubert Barer
100 Wall Street
20th fl
New York, NY 10005-3708

Allied Wallet
9000 W. Sunset Blvd, #820
West Hollywood CA 90069

Lane Powell Prof. Corporation
301 West Northern Lights Blvd.
Suite 301
Anchorage AK 99503

Garvey Schubert Barer
Bank of America Financial Center
121 SW Morrison Street, 11th floor
Portland OR 97204-3141

Andrea L. Marconi, Esq.
Fennemore Craig, P.C.
3003 N Central Ave
Suite 2600
Phoenix, AZ 85012

Garvey Schubert Barer
Flour Mill Building
1000 Potomac Street, NW, 5th Floor
Washington DC 20007-3501

David Meadows, Esq. & Phyllis B. Sumner, Esq.
King & Spauling, LLP
1180 Peachtree Street
Atlanta GA 30309-3521

Lane Powell Prof. Corporation
1420 Fifth Avenue, Suite 4200
PO Box 91302
Seattle WA 98111

Ronald P. Passatempo, Esq.
Law Offices of Ronald P. Passatempo
200 Broadway, Suite 102
Lynnfield MA 01940

Opt3 Solutions, Inc.
15642 Sand Canyon Avenue, #52255
Irvine CA 92619-2255

Edward F. Manzi, Jr.
Fidelity CoOperative bank
675 Main Street
Fitchburg, MA 01420

Elizabeth Mueller, Esq., D. Scott Carlton, Esq.
& Thomas Zaccaro, Esq.
Law Firm of Paul Hastings, LLP
515 S. Flower Street
Los Angeles, CA 90071

TD Bank
185 Franklin Street
Boston MA 02110

Ciao Telecomm, Inc.
8390 LBJ Freeway
Dallas, TX 75243

J.P. Morgan Chase, N.A.
c/o CT Corporation System
155 Federal Street, Suite 700
Boston, MA 02110

Impact This Day Inc.
c/o Debra L. Squier
506 Roxbury Drive
Safety Harbor, FL 34695

Digital Federal Credit Union
853 Donald Lynch Blvd.
Marlborough MA 01752

Robert M. Goldstein, Esq.
20 Park Plaza
Suite 2000
Boston MA 02116

Santander Bank
75 State Street
Boston MA 02109

Bank of America, N.A.
100 Federal Street
Boston MA 02110

Bertin C. Emmons, Esq.
Sovereign Bank
75 State Street, 4th floor
Boston MA 02109

Citizens Bank
28 State Street
Boston MA 02109

Michael S. Held, Esq. & Lawrence Waks, Esq.
Jackson Walker LLP
901 Main Street, Suite 6000
Dallas TX 75202

Oriental Bank
Old San Juan Branch
204 Tetuan Street
San Juan, PR 00901

Joseph R. Middleton, Esq.
KPMG, LLP
60 South Street
Boston MA 02111

Wells Fargo Bank, N.A.
c/o Corporation Service Co.
84 State Street
Boston MA 02109

Timothy Martin
Huron Consulting Services LLC
100 High Street, 23rd Floor
Boston MA 02110

Nicholas R. Kennedy, Esq.
McGuireWoods, LLP
One James Center
901 East Cary St.
Richmond, VA 23219

Miranda L. Hughes, Esq.
Brown, Winick, Graves, Gross,
Baskerville, & Schoenebaum P.L.C.
666 Grand Avenue, Suite 2000 Ruan Center
Des Moines, IA 50309

Juanita F. Garza
KPMG LLP
811 Main Street
Houston TX 77002

Mary Murrane, Esq.
United States Attorney
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston MA 02210

Andrew Lelling, Esq.
United States Attorney
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston MA 02210

Moecker Realty, Inc.
ATT: Terry Keller
1883 Marina Mile Blvd.
Suite 106
Fort Lauderdale, Florida 33315

Blue to Green Realty
ATT: Kim Fatta
500 S. Australian Avenue
Suite 600
West Palm Beach, FL 33401

Alphonsina Pena
Assistant Property Manager, Castle Group
The Palm Beach House
5600 N. Flagler Drive
West Palm Beach, FL 33407

Mr. Jamal Allam
10525 Vignon Court
Wellington FL 33449

Tax Collector
PBC
PO Box 3353
West Palm Beach, FL 33402-3353

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

NOTICE OF INTENDED PRIVATE SALE, DEADLINE FOR OBJECTIONS AND
COUNTEROFFERS, AND FINAL HEARING 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)

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 363, Fed. R. Bankr. P. 2002(a)(2), 6004, and in accordance with the *Motion By Trustee For Authority To Sell Real Property By Private Sale Free And Clear Of Liens, Claims, Interests And Encumbrances* ("Sale Motion"), 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"), intends to sell all of the Estates' right, title and interest in certain real property located at 5600 N. Flagler Drive, #307, West Palm Beach, Florida ("Real Property") to Jamal Allam or his nominee ("Purchaser") for the sum of \$133,000.00 ("Purchase Price"). The terms of the sale are more particularly described below, and are also disclosed in the Sale Motion and the purchase and sale agreement ("Sale Agreement") attached to the Sale Motion. Copies of the Sale Motion and the Sale Agreement are available from counsel to the Trustee upon request.

I. TERMS OF THE SALE

1. The Trustee seeks Court approval to convey the Real Property to the Purchaser, or to the nominee designated by the Purchaser.

2. The Trustee intends to sell the Real Property free from liens, claims, encumbrances and interests except as to restrictions, easements, and limitations as provided in the Sale Agreement. Pursuant to the Sale Agreement, the Real Property is to be sold in "as is" and "where is" condition. Further, the Trustee is not making any representations or warranties whatsoever, either express or implied, with respect to the Real Property.

3. In accordance with the terms of the Sale Agreement, the Purchaser shall pay to the Trustee on the closing date ("Closing Date"), the Purchase Price for the Real Property, in the amount of \$133,000.00 which shall be paid as follows:

- (i) \$ 5,000.00 paid as a deposit in connection with the execution of the Sale Agreement; and
- (ii) \$128,000.00 to be paid at the time of delivery of the deed.

II. THE REAL PROPERTY SHALL BE SOLD FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES

5. Pursuant to 11 U.S.C. § 363(f), the Sale Motion and the Sale Agreement, the Real Property is to be sold to the Purchaser free and clear of liens, claims, interests and encumbrances whatsoever, known or unknown, including without limitation those noted in the Sale Motion.

6. All valid liens, claims or encumbrances shall attach to the proceeds of the sale of the Real Property. The validity and enforceability of any contested lien shall be determined by the Bankruptcy Court after due notice and hearing.

7. The Trustee has requested that the Bankruptcy Court determine, at the Sale Hearing (as defined below), that the successful bidder or bidders of the Real Property be deemed to be "good faith" purchaser(s) providing to the Trustee consideration for the Real Property which constitutes payment of "value" pursuant to Section 363(m) of the Bankruptcy Code.

III. DEADLINES FOR COUNTEROFFERS, OBJECTIONS TO THE SALE MOTION AND HEARING THEREON

8. A HEARING ON THE SALE MOTION, ANY OBJECTIONS THERETO AND ANY COUNTEROFFERS FOR THE REAL PROPERTY, ARE SCHEDULED TO TAKE PLACE ON DECEMBER 12, 2017, AT 10:00 AM ("SALE HEARING") BEFORE THE HONORABLE MELVIN S. HOFFMAN, CHIEF UNITED STATES BANKRUPTCY JUDGE, United States Bankruptcy Court, John W. McCormack Post Office and Court House, 5 Post Office Square, Suite 1150, Boston, MA 02109-3945 ("COURT"). ANY PARTY WHO HAS FILED AN OBJECTION TO THE SALE MOTION OR COUNTEROFFER FOR THE PURCHASE OF THE REAL PROPERTY IS EXPECTED TO BE PRESENT AT THE SALE HEARING, FAILING WHICH THE OBJECTION MAY BE OVERRULED OR THE COUNTEROFFER STRICKEN. IF NO OBJECTION TO THE SALE MOTION OR COUNTEROFFER IS TIMELY FILED, THE COURT, IN ITS DISCRETION, MAY CANCEL THE SALE HEARING AND APPROVE THE SALE MOTION.

9. Any objection to the Sale Motion must be in writing and filed with the Clerk, United States Bankruptcy Court, John W. McCormack Post Office and Court House, 5 Post Office Square, Boston, MA 02109-3945 on or before December 4, 2017, at 4:30 PM ("Objection Deadline"). A copy of any objection must be also served upon undersigned counsel to the Trustee so as to be received on or before the Objection Deadline. Any objection must state with particularity the grounds for the objection and the interest that the objecting party has in these proceedings, and shall be governed by Fed. R. Bankr. P. 9014.

IV. COUNTEROFFER PROCEDURES

10. THROUGH THIS NOTICE, THE TRUSTEE HEREBY SOLICITS COUNTEROFFERS FOR THE REAL PROPERTY. Any and all counteroffers must be in an amount not less than \$139,650.00. All counteroffers must be accompanied by a deposit equal to \$5,000 in the form of a certified or bank check, or cash, made payable to the Trustee (the "Deposit") and delivered to counsel to the Trustee on or before December 4, 2017, at 4:30 PM (the "Counteroffer Deadline").

11. In the event of a timely counteroffer, each interested bidder shall have an opportunity to submit an additional sealed bid for the Real Property at the hearing on the sale before the Bankruptcy Court.

12. Any counteroffer must be stated in writing and filed with the Clerk, United States Bankruptcy Court, John W. McCormack Post Office and Court House, 5 Post Office Square, Boston, MA 02109-3945 on or before the Counteroffer Deadline. A copy of any counteroffer must be also served upon the undersigned counsel to the Trustee so as to be received on or before the Counteroffer Deadline.

13. Counteroffers must include an executed purchase and sale agreement upon terms substantially consistent or more favorable than the terms of the Sale Agreement. Counteroffers shall not be subject to further due diligence, may not contain any other conditions precedent to the consummation of the sale other than those provided in the Sale Agreement, and must state that the competing bidder is prepared to consummate the purchase of the Real Property within the same time period provided by the Sale Agreement.

V. SALE CLOSING

14. The Deposit will be forfeited to the estate if the highest bidder fails to complete the sale by the date ordered by the Court. The Trustee has requested that, if the sale is not completed by the highest bidder, the Court approve the sale of the Real Property to the next highest bidder.

15. You may receive a complete copy of the Sale Motion at the address set forth below. Any questions concerning the Sale Motion should be addressed to the undersigned.

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



Harold B. Murphy (BBO #362610)
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108
Telephone: (617) 423-0400
Facsimile: (617) 423-0498
Email: ALizotte@murphyking.com

Dated: November 10, 2017
734542