

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

In re:

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

Debtors.

Chapter 11 Cases

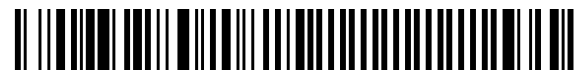
14-40987-MSH  
14-40988-MSH  
14-40989-MSH

Jointly Administered

**MOTION BY TRUSTEE TO APPROVE SETTLEMENT WITH  
SUNWIND ENERGY GROUP LLLP**

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

Stephen Darr, the duly appointed and acting Trustee (the "Trustee") of the Chapter 11 Estates of TelexFree, Inc., TelexFree, LLC and TelexFree Financial, Inc. (collectively, "TelexFree" or the "Debtors"), respectfully requests that the Court approve a settlement by and between the Trustee and Sunwind Energy Group LLLP ("Sunwind"), pursuant to Federal Rule of Bankruptcy Procedure 9019. Pursuant to the settlement, the Trustee shall consent to the sale by Sunwind and its affiliates of certain assets (the "Transferred Assets") to Expedition Wind, LLC ("EW" or the "Buyer") and shall release any liens or security interests in the Transferred Assets. In return, the Trustee shall receive, on account of his unpaid judgment against Sunwind, a payment at closing on the sale in the amount of \$148,195 and approximately fifty-six percent (56%) of any additional monies that may become available as a result of the Buyer's development of the wind energy project, up to a maximum additional recovery of \$1,326,243. In further support of this motion, the Trustee states as follows:



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