

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

STEPHEN B. DARR, TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiff,

v.
FRANZ BALAN, A REPRESENTATIVE OF A
CLASS OF DEFENDANT NET WINNERS

Defendants.

Adversary Proceeding
No. 16-4006

STEPHEN B. DARR AS TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiffs,

v.
MARCO PUZZARINI AND SANDRO PAULO
FREITAS, REPRESENTATIVES OF A CLASS
OF DEFENDANT NET WINNERS

Defendants.

Adversary Proceeding
No. 16-4007

**JOINT MOTION FOR SCHEDULING ORDER DETERMINING THE ADMISSIBILITY
AND PRESUMPTIVE EFFECT OF THE TRUSTEE'S AGGREGATION
METHODOLOGY IN DETERMINING NET WINNERS**

Stephen Darr as Trustee (the "**Trustee**") of the Chapter 11 Estates of TelexFree, LLC,
TelexFree, Inc. and TelexFree Financial, Inc. (collectively "**Telexfree**") and Franz Balan, and
Marco Puzzarini and Sandro Paulo Freitas, as representatives respectively of the Domestic and
Foreign Defendant Class of Net Winners (collectively ("**Class Actions**"), jointly request this



1440987200324000000000005

Court enter the attached Scheduling Order to address the Trustee's proposed expert testimony by Timothy J. Martin, Managing Director, Huron Consulting Group, LLC (the "Trustee's Expert") on the issue of the aggregation methodology utilized by the Trustee in determining Net Winners. In each Class Action, the Trustee asserts that the members of each class are Net Winners and alleges the amount of each member's Net Winnings that may be recovered by the Trustee as actual fraudulent transfers. The Court previously determined that Telexfree was engaged in a Ponzi scheme, which finding gives rise to a presumption in favor of the Trustee that the transfers by Telexfree to Participants in excess of the amount a Participant paid to Telexfree were made with the actual intent to hinder and delay the creditors of Telexfree. This presumption does not address the identity of the Net Winners, the amount of Net Winnings attributable to each Net Winner, or the appropriate methodology or methodologies for identifying a Net Winner and determining Net Winnings. Each Participant had numerous unlinked User Accounts reflecting transactions with Telexfree. In order to determine whether a Participant was a Net Winner and, if so, what that Participant's Net Winnings were, it is necessary to aggregate all of the User Accounts attributable to that Participant. Because the Telexfree information system did not link a Participant's User Accounts, the Trustee was required to develop a methodology to aggregate (link) Participants' User Accounts. Therefore, a determination regarding whether the methodology employed by the Trustee to determine a Participant's Net Winnings is admissible and should be adopted by the Court as the methodology to be utilized in determining the amount of Net Winnings attributable to each individual Participant is essential to the resolution of the Class Action.

In support of their Motion the Parties state as follows:

1. On January 15, 2016, the Trustee brought the Class Actions against the various named Defendants, all of whom the Trustee alleged were Net Winners and representative of the class of Participants who were Net Winners. Subsequently, on October 6, 2016 and August 3, 2017, the Court respectively certified the Domestic Class and the Foreign Class.

2. “Net Winners” are defined as those Participants in the Telexfree Ponzi scheme who received more from their participation in the scheme than they invested in the Telexfree Ponzi scheme.

3. As set forth in detail in the Class Action Complaints, Telexfree had two types of transactions by which a Participant could become a member and redeem their credits:

a. In “Direct Transactions,” the Participant would directly contract with Telexfree, make a direct payment of the membership fee to Telexfree begin earning credits. With certain limitations, Participants could subsequently redeem credits for cash directly from Telexfree for cash payments.

b. In “Triangular” Transactions, a Participant would be recruited by another Participant, who would satisfy the recruited Participant’s membership fee through redemption of his/her credits. The Trustee asserts that as part of the foregoing exchange, the recruiting Participant would collect cash from recruited Participant in the same amount as the invoice issued by Telexfree. This third part of the “Triangular” transaction, however, was not documented or in any way recorded by Telexfree’s servers.

4. Each time a Participant transacted with Telexfree, either in a Direct or a “Triangular” Transaction, a new User Account would be opened for that specific transaction and attributed to that Participant. As noted in the Complaint and various other pleadings before the

Court, Participants often opened multiple User Accounts under various iterations of their user name.

5. Telexfree's computerized record system tracked certain transactions in each individual User Account so that with respect to each individual User Account, the amounts that were supposed to be paid by that Participant, whether in a "Direct" or a "Triangular" Transaction, were recorded, as were certain distributions paid to that Participant. The system also recorded transactions so as to enable the counterparty to each Triangular Transaction to be identified. Thus, with respect to each particular transaction, the Telexfree computer system would provide information to indicate whether the transaction was direct or triangular, the amount of the direct or triangular invoice, whether paid in directly in cash or satisfied with credits, and the counterparty to each Triangular Transaction. The information was also sufficient to determine the monthly value of directly redeemed credits. The Trustee alleges that recruiting Participants who satisfied invoices received cash in the face amount of the invoice. The Trustee's allegations also do not take into account, other credit transfers between Participants, essentially assigning zero valuing such credit transactions.

6. The Telexfree computer system did not directly link User Accounts. Accordingly, the Trustee was required to develop a methodology so he could identify related User Accounts attributable to a single Participant, aggregate those related User Accounts, determine from those accounts all the monies paid to Telexfree, whether directly or through Triangular Transactions, and all redemption of credits made by that Participant, whether directly or through Triangular Transactions, from which the Trustee would be able to calculate whether a Participant was a Net Winner or Net Loser.

7. Huron Consulting Group LLC (“**Huron**”) was retained by the Trustee to develop a methodology to link various User Accounts with a particular Participant so as to be able to aggregate all the Participant’s user accounts and determine whether the Participant is a Net Loser or Net Winner.

8. The development of the methodology, the underlying assumptions, and the application of the methodology to determine Net Winners and Net Losers are the subject of an expert report prepared by Timothy J. Martin of Huron with the assistance of various individuals at Huron acting under his supervision.

9. The Class Action Defendants have retained Stoneturn as their rebuttal expert (“**Class Expert**”). Stoneturn has been provided with access to the Telexfree information system. Further, Huron has met with representatives of Stoneturn and provided them with information as to the operation of Telexfree’s information system, an overview with respect to the functioning of the system and of the Ponzi scheme itself. Further, Huron has discussed with Stoneturn certain steps and assumptions made by Huron in connection with the development of its methodology.

10. On February 3, 2020, the Trustee provided to the Class Actions’ counsel a copy of the expert report of Trustee’s Expert Timothy J. Martin.

11. The Class Actions’ counsel has advised that they will likely challenge the reliability and admissibility of the expert opinion of Timothy J. Martin as reflected in his expert report. The Class Actions’ counsel has indicated that they anticipate raising some or all of the following issues with respect to the admissibility of Martin’s expert opinion:

- (a) Whether Martin is qualified as an expert by knowledge, skill, experience, training, and education to testify in the form of an opinion;

- (b) Whether Martin's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue;
- (c) Whether Martin's testimony is based upon sufficient facts or data;
- (d) Whether Martin's testimony is the product of reliable principles and methods; and
- (e) Whether Martin has reliably applied the principles and methodology to the facts of the case.

12. In addition, it is anticipated that the Class Action Defendants will challenge certain of the underlying assumptions made by Martin in arriving at his expert opinion. Specifically, Class Action Defendants will challenge: (1) the reliability of the assumptions and algorithms used to aggregate user data for purposes of identifying Net Winner and calculating Net Winnings, where the user data was not subject to any validation or screening, and (2) the reliability of the assumptions that for certain transactions, credits were valued at 100 cents on the dollar, whereas in other transactions, credits were valued at \$0 cents on the dollar.

13. The Parties agree that a central issue to resolution of these actions is (a) the admissibility of Martin's expert opinion and (b) whether Martin's expert opinion, in conjunction with the Ponzi Presumptions, establishes the Trustee's prima facie case shifting the burden of production to the individual Class Action Defendants.

14. The Parties believe that the most efficient and expeditious way of proceeding is for the Court in the first instance to determine the admissibility and weight to be accorded the expert opinion of Timothy Martin. Accordingly, the Parties propose the entry of the following Scheduling Order to properly develop this central issue for resolution by the Court:

- (1) The Class Action Defendants shall provide the Trustee with any rebuttal expert report on or before June 5, 2020.
- (2) If the Trustee deems it necessary to do so, the Trustee may prepare a rebuttal report and shall provide any rebuttal report to the Defendants twenty (20) days from receipt of the Class Action Defendants' report.
- (3) To the extent that the Parties propose to exchange data and paper discovery relative to the Trustee's Expert Report, all such data and paper discovery shall be exchanged by April 27, 2020.
- (4) To the extent that the Parties propose to engage in expert depositions, all such expert depositions shall be concluded by twenty (20) days from receipt of the Trustee's rebuttal report or the Trustee's statement he does not intend to submit a rebuttal report.
- (5) The Parties shall file a status report with the Court on or before July 10, 2020, which shall advise the Court as to the status of the matter and those issues which the Court needs to conduct an evidentiary hearing on in order to appropriately determine the admissibility of the Martin expert opinion, the weight to be given the opinion, and whether said opinion satisfies the Trustee's prima facie case.

WHEREFORE, Stephen B. Darr as Trustee of the Chapter 11 Estates of TelexFree, LLC, TelexFree, Inc. and TelexFree Financial, Inc., and the Class Action Representative in the Domestic Class Action and the Class Action Representative in the Foreign Class Action request

that the Motion be allowed and the Court enter a Scheduling Order substantially consistent with the proposed Order annexed hereto.

STEVEN B. DARR, AS HE IS THE CHAPTER 11
TRUSTEE OF THE DEBTORS' ESTATES

By his counsel,

/s/ Andrew G. Lizotte

Harold B. Murphy (BBO #362610)
Charles R. Bennett, Jr. (BBO #037380)
Andrew G. Lizotte (BBO #559609)
MURPHY & KING,
Professional Corporation
One Beacon Street
Boston, MA 02108
Tel: (617) 423-0400
Fax: (717) 423-0498
hmurphy@murphyking.com
cbennett@murphyking.com
alizotte@murphyking.com

BENJAMIN ARGUETA, ET AL.,
CLASS REPRESENTATIVE,
DOMESTIC CLASS ACTION

By their counsel,

/s/ Ilyas J. Rona

Ilyas J. Rona (BBO #642964)
Michael J. Duran (BBO # 569234)
Milligan Rona Duran & King
50 Congress Street, Suite 600
Boston, MA 02109-4075
Tel: (617) 395-9570
Fax: (855) 395-5525
ijr@mrcklaw.com
mjd@mrcklaw.com

MARCO PUZZARINI, ET AL.,
CLASS REPRESENTATIVE
FOR FOREIGN CLASS OF DEFENDANTS

By their counsel,

/s/ Ilyas J. Rona
Ilyas J. Rona (BBO #642964)
Michael J. Duran (BBO # 569234)
Milligan Rona Duran & King
50 Congress Street, Suite 600
Boston, MA 02109-4075
Tel: (617) 395-9570
Fax: (855) 395-5525
ijr@mrldklaw.com
mjd@mrldklaw.com

Dated: March 17, 2020
772118

EXHIBIT A

**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

STEPHEN B. DARR, TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiff,

v.
FRANZ BALAN, A REPRESENTATIVE OF A
CLASS OF DEFENDANT NET WINNERS
Defendants.

Adversary Proceeding
No. 16-4006

STEPHEN B. DARR AS TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiffs,

v.
MARCO PUZZARINI AND SANDRO PAULO
FREITAS, REPRESENTATIVES OF A CLASS
OF DEFENDANT NET WINNERS
Defendants.

Adversary Proceeding
No. 16-4007

**SCHEDULING ORDER FOR DETERMINING THE ADMISSIBILITY
AND PRESUMPTIVE EFFECT OF THE TRUSTEE'S AGGREGATION
METHODOLOGY IN DETERMINING NET WINNERS**

This matter having come before the Court upon the Joint Motion of Parties requesting the Court enter a Scheduling Order to address issues relating to the admissibility and presumptive effect of the Trustee's aggregation methodology as set forth in the Report of Timothy Martin, who prepared an expert report relating to same.

NOW THEREFORE, Based on the Parties' Joint Motion for entry of a Scheduling Order to address resolution of (a) the admissibility of Martin's expert opinion and (b) whether Martin's expert opinion, in conjunction with the Ponzi Presumptions, establishes the Trustee's prima facie case shifting the burden of production to the individual Class Action Defendants, the Court enters the following Order:

- (1) The Class Action Defendants shall provide the Trustee with any rebuttal expert report on or before June 5, 2020.
- (2) If the Trustee deems it necessary to do so, the Trustee may prepare a rebuttal report and shall provide any rebuttal report to the Defendants Twenty (20) days from receipt of the Class Action Defendants' report.
- (3) To the extent that the Parties propose to exchange data and paper discovery relative to the Trustee's Expert Report, all such data and paper discovery shall be exchanged by April 27, 2020.
- (4) To the extent that the Parties propose to engage in expert depositions, all such expert depositions shall be concluded by Twenty (20) days from receipt of the Trustee's rebuttal report or the Trustee's statement he does not intend to submit a rebuttal report.
- (5) The Parties shall file a status report with the Court on or before July 10, 2020, which shall advise the Court as to the status of the matter and those issues which the Court needs to conduct an evidentiary hearing on in order to appropriately determine the admissibility of the Martin expert opinion,

the weight to be given the opinion, and whether said opinion satisfies the
Trustee's prima facie case.

Dated at Boston within said District this _____ day of _____, 2020.

Melvin S. Hoffman
United States Bankruptcy Judge

772052

**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

STEPHEN B. DARR, TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiff,

v.
FRANZ BALAN, A REPRESENTATIVE OF A
CLASS OF DEFENDANT NET WINNERS
Defendants.

Adversary Proceeding
No. 16-4006

STEPHEN B. DARR AS TRUSTEE
OF THE ESTATES OF TELEXFREE, LLC,
TELEXFREE, INC. and TELEXFREE
FINANCIAL, INC.,

Plaintiffs,

v.
MARCO PUZZARINI AND SANDRO PAULO
FREITAS, REPRESENTATIVES OF A CLASS
OF DEFENDANT NET WINNERS
Defendants.

Adversary Proceeding
No. 16-4007

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on March 17, 2020, I caused to be served a copy of the following document via operation of this Court's CM/ECF System as indicated to the attached service list:

- ***Joint Motion for Scheduling Order Determining the Admissibility and Presumptive Effect of the Trustee's Aggregation Methodology in Determining Net Winners***

/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: March 17, 2020
772160

Benjamin Argueta
14 Illinois Avenue, Apt. 1
Somerville, MA 02145

Alexandro Rocha
6 Nell Road
Revere, MA 02151

Jose Neto
49 Rodney Street
Worcester, MA 01605

Julio C. Paz
179 Water Street
Framingham, MA 01701

Euzebio Sudre Neto
334 Chestnut Farm Way
Raynham, MA 02767

Hugo Alvarado
18 Catherine St., #1
Worcester, MA 01605

Ana R. Ramos
63 Fremont Av., Apt. 2
Chelsea, MA 02150

Linda Suzanne Hackett
97 Bellevue Ave.
Melrose, MA 02176

Ruddy Abreau
9 Longwood Drive
Methuen, MA 01844

Marco Almeida
420 Atlantic Ave.
Long Branch, NJ 07740

Rodrigo Montemor
6 Boxford Street
Lawrence, MA 01843

Laureano Arellano
576N 800W
Provo, UT 84601

Aaron Ataide
2900 W. Porter Ave.
Visalia, CA 93291

Rosane Cruz
22 Northampton Street
Worcester, MA 01605

Omar Quinonez
3812 N. Oak Dr., Apt. M62
Tampa, FL 33611

Carlos C. Dejesus
72 Fremont Ave., Apt. 2
Chelsea, MA 02150

Bilkish Sunesara
8211 Longvale Drive
Rosenberg, TX 77469

Andres Bolivar Estevez
9510 90th Ave. 2
Woodhaven, NY 11421

Jose Lopez
164 Exchange St., 2nd Floor
Lawrence, MA 01841

Ana Rosa Lopez
5019 Redwing Brook Trail
Katy, TX 77449

Frantz Balan
51 Grover Street, Apt. 2
Everett, MA 02149

Marcelo Dasilva
38 Lyme Street, #308
Malden, MA 02148

Gladys Alvarado
177 Lincoln St., #2
Worcester, MA 01605

James P. Erhard
250 Commercial Street
Suite 410
Worcester, MA 01608

**

Maria Teresa Milagres Neves
2B Brackett Rd.
Framingham MA 01702

Marcos Lana
41 Beacon St.
Framingham MA 01701

Luiz Antonio da Silva
25 Willis St.
Framingham MA 01702

Bruno Graziani
134 Highland St.
Marlborough, MA 01752

Eduardo N. Silva
10111 Newington Dr.
Orlando, FL 32836

Michel Cristiano Santolin de Arruda
26 Beacon St., Apt. 12A
Burlington, MA 01803

Francisdalva Siqueira
9715 Arbor Oak Ct., Apt. 301
Boca Raton, FL 33428

Alexander N. Aurio
15 W. Prescott Ave.
Clovis, CA 93619

Amilcar Lopez
94 Broadway
Somerville, MA 02145

Davidson R. Teixeira
33 Vernal St. #1
Everett, MA 02149

Julio Silva
111 E. Washington St., Unit 2221
Orlando, FL 32801

Jesus Osuna
700 N Avery Ave.
Farmersville, CA 93223

Jose Carlos Maciel
18 Hayes St., Apt. 2
Framingham, MA 01702

Edilene Storck Navarro
55 Fox Rd., Unit 925
Waltham, MA 02451

Vaming Services
8228 Bedford Cove Way
Sacramento, CA 95828

Gelalin-3377, LLC
53 Walk Hill St., Apt 2
Jamaica Plain, MA 02130

Rodrigo Castro
11922 Golden Lodge Lane
Houston, TX 77066

Edson F Souza
1003 Acton Ave.
Lehigh Acres, FL 33971

Jorge Antonio Mejia Sequeira
3055 Jasmine Valley Dr.
Canyon Country, CA 91387

Timex Research Consulting Inc.
10724 71st Rd., Apt. 14C
Forest Hills, NY 11375

Wesley Dias
21103 Via Eden
Boca Raton, FL 33433

Team Global Adverting LLC.
13506 Paddington Circ.
Austin, TX 78729

Celso Roberto Silva Filho
261 Whalepond Rd.
Oakhurst, NJ 07105

Bartolo Castllo
23530 Canyon Lake Dr.
Spring, TX 77373

LWC Marketing, Inc.
57 Freeman Lane
Buena Park, CA 90621

Luisa E. Lopez
168 Thorndike St. #1
Cambridge, MA 02141

Gaspar Jesus
235 Boston St., Apt 3
Lynn, MA 01904

United Group USA
5620 Bay Side Dr.
Orlando, FL 32819

Marcio Souza Nery
260 Potter St.
New Bedford, MA 02740

Daneng Xiong
280 St. Augustine Dr.
Chico, CA 95928

Joelito Souza Caldas Junior
9751 Majorca Pl.
Boca Raton, FL 33434

Lusette Balan
5648 Lowell St.
Peabody, MA 01960

Jean 2004 Enterprise Corp.
1310 Partridge Close
Pompano Beach, FL 33064

Faith Sloan
4809 Crystalline Pl., Apt. 102
Virginia Beach, VA 23462

New Generation Med Supply Inc.
1037 51st ST., Apt. D7
Brooklyn, NY 11219

Nubia R Goulart
40 Grant Street
PO Box 1107
Framingham, MA 01702

Carlos Alfaro
20 Manor Place
Huntington Station, NY 11746

Gilson Nassar
3500 W. Hillsboro Blvd., Apt. 201
Coconut Creek, FL 33073

Technovia Inc.
533 Cambridge St., Unit 310
Allston, MA 02134

Yue Chen
1935 Potrero Grande Dr., Apt. 209
Monterey Park, CA 91755

Mariza S Morinelli
131 S. Federal Hwy., Apt. 527
Boca Raton, FL 33432

Paulo Giuliano Diogenes de Bessa Rosado
420 Atlantic Ave.
Long Branch, NJ 07740

Roberto Nunez
16 Fairfield St.
Worcester, MA 01602

Lan Lan Ji
1535 83rd St. #2
Brooklyn, NY 11228

Jose Miguel Filho
27 Liberty St.
Gloucester, MA 01930

Jap International Network LLC
16490 Gateway Bridge Dr.
Delray Beach, FL 33446

Wallace Augusto Da Silva
57 Greenwood St.
Marlborough, MA 01752

Ezau Soares Ferreira
27 High St., Apt. 2
East Weymouth, MA 02189

Eddie Alberto Duverge
90 Prospect Ave.
Revere, MA 02151

Global Marketing Strategies
2460 E. Pole Rd.
Everson, WA 98247

Carlos Vanterpool
255 Hidden Springs Cir.
Kissimmee, FL 34743

Devendra Shah
5002 N. Oaks Blvd.
North Brunswick, NJ 08902

Pat Jackson
12314 E. 55th Terr.
Kansas City, MO 64133

Silverio Reyes
70 W. Walnut Park, Apt. 2
Roxbury, MA 02119

Fabiana Acacia Da Cruz Dos Santos
7983 NW 70th Ave.
Parkland, FL 33067

Dwayne Jones
6406 Julie Ann Dr.
Hanover, MD 21076

Gerald Agnew
3324 Parsons Blvd., Apt. 6P
Flushing, NY 11354

Joseph Pietropaolo
224 Sarahs Lane
Liberty Hill, TX 78642

Jamilson Marcos Conceicao
5451 Ginger Cove Dr., Apt. A
Tampa, FL 33634

Wesley Nascimento Alves
37 Lawrence St.
Everett, MA 02149

Milagros Adames
71 Swan St.
Methuen, MA 01844

Ronei Barreto
14 Branchport Ave.
Long Branch, NY 07740

Parrot Bay Homes, Inc.
6851 Cypress Cove Cir.
Jupiter, FL 33458

LM Davar Inc.
6350 S. Elm Ln.
Lake Worth, FL 33462

Ricardo Fabin
60 Stevens Ave.
Lawrence, MA 01843

Edgar Borelli
291 Thompson St.
Halifax, MA 02338

Faustino Torres
5514 Minaret Ct.
Orlando, FL 32821

Daniel Chavez
4149 S. Church St.
Visalia, CA 93277

....

Luiz Antonio da Silva
133 Concord Street
Framingham MA 01702

Chai Hock Ng, a/k/a Chai Ha Ng
13525 Roosevelt Ave., #2D
Flushing NY 11354

Soraya Ferreira
6350 S. Elm Lane
Lake Worth, FL 33462

Helio Barbosa
2B Brackett Road
Framingham MA 01720

David Reis
25 MacArthur Street, Apt 2
Somerville MA 02145

David Reis
25 MacArthur Street, Apt 1
Somerville MA 02145

Rudmar Gentil, a/k/a Rudmar DaSilva
423 Washington Ave., Apt. 7R
Chelsea MA 02150

Debora C. Brasil
802 Harbor Inn Dr.,
Coral Springs, FL 33071-5614

Venerando Contreras
6182 Bryce Canyon Ave
Las Vegas, NV 89156-5859

Bingjian Pan
75 E. 4th St., Apt 23
New York, NY 10003-0832

Randy Crosby
31 Club Court, #9
Alpharetta, GA 30005-7422

Rodrigo R. Breda
6 Port Au Peck Ave
Long Branch NJ 07740-7668

Antonio Oliveira
430 Broadway St., Unit #9
Lowell MA 01845

Sonya Crosby
30 Club Court, #9
Alpharetta, GA 30005-7422

Louisa E. Lopez
110 Francis Street
Everett MA 02149

Antonio Oliveira
29141 US Highway, 19N Lot 5
Clearwater FL 33761

Louisa E. Lopez
5 Oak Street
Andover MA 01810

BY ECF:

- Charles R. Bennett cbennett@murphyking.com,
bankruptcy@murphyking.com;imccormack@murphyking.com;amaciver@murphyking.c
om;dmeyer@murphyking.com;ecf-ca5a5ac33a04@ecf.pacerpro.com
- Evans J. Carter ejcatty1@verizon.net
- Gary W. Cruickshank gwc@cruickshank-law.com,
cruickshankgr87938@notify.bestcase.com
- James P. Ehrhard ehrhard@ehrhardlaw.com, cote@ehrhardlaw.com
- Valentin D. Gurvits vgurvits@bostonlawgroup.com

- Andrew G. Lizotte agl@murphyking.com,
bankruptcy@murphyking.com;pas@murphyking.com;ddk@murphyking.com;agl@murp
hyking.com;ecf-72a6723957cc@ecf.pacerpro.com
- Michael M. McArdle mike@mcardlelaw.com, morgan@mcardlelaw.com
- Wendy M. Mead wendymeadpc@verizon.net
- Michael K. O'Neil moneil@murphyking.com, dkonusevska@murphyking.com;ecf-
b51ce627ec66@ecf.pacerpro.com
- Ilyas J. Rona ijr@mrcklaw.com, gnc@mrcklaw.com,kae@mrcklaw.com
- Hilary Schultz hschultz@engelschultz.com
- Jordan L. Shapiro JSLAWMA@aol.com
- Matthew Shayefar matt@bostonlawgroup.com
- Elton Watkins watkinslaw@comcast.net

BY ELECTRONIC MAIL:

Renato Sacramento
albertoestaine@hotmail.com
nandinha01@hotmail.com

William Baldiga, Esq.
Brown Rudnick LLP
One Financial Center
Boston, MA 02111
Email: wbaldiga@brownrudnick.com

Deena Bernstein, Esq.
Securities Exchange Commission
33 Arch Street
Boston, MA 02110
Email: bernsteinD@sec.gov