

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

**In Re:**

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

**Reorganized Debtors.**

**Chapter 11**

**Case No. 14-40987-MSH**

**Case No. 14-40988-MSH**

**Case No. 14-40989-MSH**

**Substantively Consolidated**

**SUPPLEMENT TO  
FIFTH AND FINAL APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES BY MURPHY & KING, PROFESSIONAL  
CORPORATION, COUNSEL TO STEPHEN B. DARR, CHAPTER 11 TRUSTEE**

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

Murphy & King, Professional Corporation (“M&K”), counsel to Stephen B. Darr, the duly appointed Chapter 11 trustee (the “Trustee”) of the estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the “Debtors” or “TelexFree”) respectfully submits this Supplement to the Fifth and Final Application for Compensation and Reimbursement of Expenses (the “Application”) for the period from April 1, 2018 through July 14, 2020 (“Application Period”).

1. On July 24, 2020, M&K filed the Application which sought approval and payment of fees in the amount of \$2,442,534.00 and reimbursement of expenses in the sum of \$48,846.26 for services rendered and expenses incurred during the period from April 1, 2018 through July 14, 2020 (the “Application Period”). The Application included the actual amounts for services rendered and expenses incurred through June 30, 2020 and estimated fees and



expenses of \$85,000 for the period from July 1, 2020 through the Effective Date of the Plan July 14, 2020 (the “Supplemental Period”).<sup>1</sup>

2. As set forth in the Application, M&K represented that it would file a supplement to the Application reflecting the actual amount of fees and expenses relating to the Supplemental Period for which approval is sought.

3. Attached hereto as Exhibits A and B are M&K’s itemization of services rendered and expenses incurred during the Supplemental Period, reflecting fees in the amount of \$56,942.50 and expenses in the amount of \$831.21. Pursuant to the Application and this Supplement, M&K requests approval of these amounts for work done during the Supplemental Period, which shall supercede the estimated fees and expenses for the Supplemental Period contained in the Application.

4. Accordingly, the total fees sought by M&K in the Application are \$2,414,476.50 and the total expenses sought by M&K in the Application are \$49,677.47.

MURPHY & KING  
PROFESSIONAL CORPORATION,  
BY,

/s/ Andrew G. Lizotte  
Harold B. Murphy (BBO #362610)  
Andrew G. Lizotte (BBO #559609)  
MURPHY & KING  
Professional Corporation  
One Beacon Street  
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Dated: August 5, 2020  
783461

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<sup>1</sup> The \$85,000.00 estimate is included in the \$2,442,534.00 total fee request.

**EXHIBIT A**  
**Services Related to Claims Administration**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
07/01/20	AGL	Emails with Huron re: S. Menjivar inquiry	.10
07/01/20	AGL	Emails with court re: inquiry of A. Francois; review correspondence	.20
07/01/20	AGL	Email to H. Murphy, Trustee re: ballot issues, confirmation order	.20
07/01/20	AGL	Review responses to claim objection by J. Saldana, W. Borges	.30
07/01/20	AGL	Emails and telephone conference from R. Riemer, P. Kirschner, K. McLeod, E. Ndenga re: claim/ballot inquiries	.40
07/01/20	AGL	Conference with T. Feil re: distribution issues; email re: same	.70
07/01/20	AGL	Conference with H. Murphy re: objections to confirmation, ballot issues; email to N. Cohen re: same	.80
07/01/20	AGL	Work on service issues in preparation for plan hearing; emails, telephone conferences wot Huron, BMC re: same	.80
07/01/20	AGL	Work on revisions to four claims objection orders	1.00
07/01/20	AGL	Work on confirmation order, draft notice of confirmation/effective date	3.50
07/01/20	HBM	Review objection to confirmation and conference with A. Lizotte re: response, confirmation and ballot issues; email re: same	1.50
07/02/20	AGL	Emails with Shapiro, Huron re: resolution of DeMoura claim	.20
07/02/20	AGL	Review June time entry issues	.20
07/02/20	AGL	Email from D. Goncalves re: settlement of Saleh, Varela claims; review prior affidavits re: settlement terms; draft notice and stipulation	.60
07/02/20	AGL	Emails and telephone conferences with Court, Huron, BMC re: IT links for confirmation hearing, work on list/participate notices; review list of requesting parties; conference with Trustee re: same	1.50
07/02/20	AGL	Work on Trustee's affidavit in support of plan confirmation	2.50
07/02/20	AGL	Conferences with H. Murphy re: terms of	4.00

		confirmation order, post-confirmation notices and requests for participant payment information; work on revisions to documents	
07/02/20	HBM	Work on confirmation order and notices to participants; 2 conferences with A. Lizotte re: same	2.00
07/03/20	AGL	Follow up emails from BMC re: service of confirmation hearing notices	.20
07/03/20	AGL	Emails with KCC re: I. Batista objection to transfer of claim	.20
07/03/20	AGL	Email from E. Berardino re: Saleh/Varela claim settlements; revise stipulation; email to D. Goncalves re: same	.30
07/03/20	AGL	Work on June time categorization	1.00
07/03/20	AGL	Further conference with H. Murphy re: confirmation order and related notices; work on revisions	2.00
07/03/20	AGL	Work on Darr confirmation affidavit	3.00
07/03/20	HBM	Further work on confirmation issues and documents; conference with A. Lizotte re: same	1.00
07/06/20	AGL	Emails with T. Murphy (DOJ) re: confirmation hearing	.20
07/06/20	AGL	Emails re: W. Borges, Ndenga claim status	.20
07/06/20	AGL	Review and file certificate of service for BMC re: 7/8 hearing	.20
07/06/20	AGL	Review and comment on affidavit re: vote tabulation	.50
07/06/20	AGL	Further revisions to important notice re: payment information; conference with H. Murphy, T. Feil re: same	.80
07/06/20	AGL	Begin preparing for confirmation hearing, review objections; telephone conference with N. Cohen re: objection	1.00
07/06/20	AGL	Further work on confirmation order; conference with H. Murphy re: same; draft notice of filing of order	2.00
07/06/20	AGL	Conference with H. Murphy, Trustee re: Darr confirmation affidavit	2.50
07/06/20	HBM	Emails re: IRS and Department of Justice re: settlement	.30
07/06/20	HBM	Review and revise draft confirmation affidavit for Chapter 11 trustee; several conferences with A. Lizotte re: same; emails re: same and confirmation	2.50
07/07/20	AGL	Telephone conference with E. Berardino re: disposition of remaining AFC disputed claims	.20
07/07/20	AGL	Review memo re: status of MDL action, new PwC defendants	.20
07/07/20	AGL	Telephone conference with N. Cohen re: status of her objection	.20
07/07/20	AGL	Emails with T. Murphy (DOJ) re: plan hearing, bridge information	.30

07/07/20	AGL	Emails with Huron re: claim of E. Loughery;	.30
07/07/20	AGL	telephone conference with Diana F. re: claim/ballot	
07/07/20	AGL	Finalize and file confirmation order	.50
07/07/20	AGL	Telephone conference with T. Feil re: post-	.80
		confirmation notice to participants, form of request	
		for payment information; draft revisions	
07/07/20	AGL	Organize categories for fee application	1.00
07/07/20	AGL	Work on reconciliation of funds in various accounts	2.00
		in anticipation of confirmation hearing	
07/07/20	AGL	Prepare outline for confirmation hearing	2.00
07/07/20	HBM	Review and revise draft press release; conference	.80
		with A. Lizotte re: same	
07/07/20	HBM	Work on confirmation issues; multiple conferences	2.50
		with A. Lizotte re: same; emails re: same	
07/08/20	AGL	Telephone conference with P. Thomas re:	.20
		Prabhakaran claim/ballot	
07/08/20	AGL	Follow up emails from Salgueiros re: payment	.20
		notice inquiries	
07/08/20	AGL	Review responses by N. Landaverde, M. Kombo to	.30
		objections to general claims	
07/08/20	AGL	Review status of claims resolution; telephone	.50
		conference with E. Berardino re: same	
07/08/20	AGL	Review community group revisions to important	1.20
		notice of payment information; work on revisions;	
		conference with Trustee, H. Murphy re: same;	
		arrange for filing amended notice	
07/08/20	AGL	Work on exhibits to final fee application	1.50
07/08/20	AGL	Prepare for and attend plan confirmation hearing	4.50
07/08/20	HBM	Attend confirmation hearing; conference with A.	1.70
		Lizotte before and after the hearing; emails re: same	
07/08/20	HBM	Work on preparation for confirmation hearing;	3.00
		review proposed revision to participant notice;	
		conference with A. Lizotte re: same	
07/09/20	AGL	Email from D. Goncalves re: disputed claim of V.	.10
		Dos Santos	
07/09/20	AGL	Emails with KPMG re: fee applications, plan status	.20
07/09/20	AGL	Emails with J. Craft re: status of Sunwind	.20
		development	
07/09/20	AGL	Review response by R. Riemer to claim objection	.20
07/09/20	AGL	Emails with M. Cordavil, J. DeJesus, G. Veras re:	.30
		status of plan/distributions	
07/09/20	AGL	Emails with BMC re: revised notice of payment	.40
		information, website, distribution issues	
07/09/20	AGL	Work on final fee applications; review time entry	6.00
07/09/20	HBM	Multiple emails re: case status and Effective Date,	.80
		noticing, etc.	
07/10/20	AGL	Emails with Gambrone law firm re: OFAC issues	.20

07/10/20	AGL	Review BMC memo on timeline for distributions/notices; email response re: same	.40
07/10/20	AGL	Telephone conference with T. Feil re: final revisions to request for payment notice	.50
07/10/20	AGL	Work on final fee application-litigation sections	.80
07/11/20	AGL	Emails with B. Hayes re: ballot/claims	.10
07/11/20	AGL	Emails with KCC re: transfer of claim of J. Mieses	.20
07/13/20	AGL	Email from M. Casperson re: M. Portilla claim	.10
07/13/20	AGL	Review draft motion to extend Stoneturn report deadline	.10
07/13/20	AGL	Telephone conference with Trustee re: claim inquiries	.20
07/13/20	AGL	Email to Trustee, Huron re: claims schedule/deadlines, action items	.40
07/13/20	AGL	Emails from B. Hayes, T. Primon, I. Shikman re: claim/payment status; email from I. Ignuanogo re: claim research; email from Trustee re: Mieses claim transfer dispute	.50
07/13/20	AGL	Draft settlement stipulation and notice re: claim of Sharon Reed; emails re: same	.60
07/13/20	AGL	Finalize and file 10th and 11th omnibus claims objections; revise exhibits; emails re: same	1.80
07/13/20	AGL	Work on fee application issues	3.00
07/13/20	HBM	Review of KPMG final fee application and email re: same	.70
07/13/20	HBM	Deal with claims and issues re: Effective Date; email re: same; conference with A. Lizotte re: fee application, etc.	1.00
07/14/20	AGL	Email from BMC re: Giambrone ballots	.20
07/14/20	AGL	Emails with L. Veres re: status of claims/distributions	.20
07/14/20	AGL	Conference with H. Murphy re: distribution issues, effective date	.40
07/14/20	AGL	Work on final fee application narrative; conference with H. Murphy re: same	4.50
07/14/20	HBM	Conference with A. Lizotte re: distribution, claims, issues, Effective Date; email re: same	.50

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
ANDREW G. LIZOTTE	68.60	650.00	44,590.00
HAROLD B. MURPHY	18.30	675.00	12,352.50

**Total Fees** \$56,942.50

**EXHIBIT B**  
**Disbursements**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
Pacer Research	229.40
Photocopying/Imaging In-House	389.85
Postage	211.96
<b>Total Disbursements</b>	<b><u>\$ 831.21</u></b>