

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

**OPPOSITION BY LIQUIDATING TRUSTEE TO EXPEDITED MOTION FOR
REQUEST TO REINSTATE PROOF OF CLAIM FILED BY EDIVALDO ALVES REIS
AND TIME TO FILE SUPPORTING DOCUMENTS**

Stephen B. Darr, the duly appointed Liquidating Trustee (the "Liquidating Trustee") of the reorganized bankruptcy estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Reorganized Debtors" or "TelexFree") respectfully files this opposition to the *Expedited Motion for Request to Reinstate Proof of Claim filed by Edivaldo Alves Reis and Time to File Supporting Documents* (the "Motion to Reinstate"). The Motion to Reinstate fails to articulate any basis for vacating an order disallowing the claim of Mr. Reis nearly two years ago and should be denied. In further support of this opposition, the Liquidating Trustee states as follows:

Background

1. On April 13, 2014 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code ("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.



3. On the Petition Date, the Debtors filed a motion for joint administration of the cases, with TelexFree, LLC designated as the lead case. By order dated April 24, 2014, the motion for joint administration was approved.

4. On May 6, 2014, the Court allowed the motion by the Securities and Exchange Commission to change the venue of the cases to the United States Bankruptcy Court for the District of Massachusetts (the “Court”). The cases were transferred to the Court on May 9, 2014.

5. On May 30, 2014, this Court allowed the motion by the Office of the United States Trustee’s to appoint a Chapter 11 trustee, and Stephen Darr was appointed on June 6, 2014 (the “Chapter 11 Trustee”).

6. On July 9, 2020, the Court entered an order confirming the Trustee’s *First Amended Liquidating Plan of Reorganization* (the “Plan”). The Plan provides for the Chapter 11 Trustee to serve as Liquidating Trustee on and after the Effective Date of the Plan as the representative of the Reorganized Debtors.

The Claims Process

7. On October 7, 2015, the Trustee filed his *Motion by Chapter 11 Trustee for Entry of Order Fixing Bar Date for Filing Proofs of Claim, Approving Form and Manner of Providing Notice, Directing that Claims be Filed Electronically, and Approving Content of Electronic Proofs of Claim* (the “Claims Motion”) which motion was approved by order dated January 26, 2016 (the “Claims Order”). Pursuant to the Claims Motion and Order, the Trustee sought and obtained authority to have all Participant claims filed electronically (an “ePOC”) through a single internet portal (the “Portal”).

8. On May 27, 2016, and after the Portal became operational, the Trustee served a *Notice of Deadline for Filing Electronic Proofs of Claim and Claims Procedures* (the “Bar Date”).

Notice”)[docket entry 743], directing creditors to file claims through the Portal located at **telexfreeclaims.com**. The Bar Date Notice established an initial bar date of September 26, 2016 (the “First Bar Date”) for the filing of electronic claims.

9. On September 14, 2016, Mr. Reis filed an ePOC asserting a claim in the amount of \$345,000. The ePOC did not identify any User Accounts attributable to Mr. Reis. Mr. Reis simply manually inserted an amount due of \$345,000 with no supporting documentation. The email address provided in Mr. Reis’ ePOC for notice was baiakclean@yahoo.com (the “Email Address”). A copy of the ePOC is attached as Exhibit “A”.

10. On October 16, 2017, the Trustee filed a *Motion by Trustee to Establish Omnibus Procedures for the Resolution of Disputed Participant Claims*, which motion was approved by order dated December 26, 2017 (the “Claims Procedure Order”).

11. The Claims Procedure Order provided for the resolution of claims initially by an out-of-court process, with Court adjudication only as to those matters which remained contested and could not be settled. Specifically, the Claims Procedure Order provided for the Trustee to issue to those Participants with disputed claims a *Notice of Proposed Resolution of Claim*, with an explanation of any disputed items, and provided Participants with thirty (30) days to supplement their claim or contest the Trustee’s findings (the “First Notice”).

12. If a Participant did not respond to the First Notice, the Claims Procedure Order provided that the Trustee would file a notice of claim allowance or disallowance with the Court, again providing the Participant with fourteen (14) days to respond and supplement their claim (the “Second Notice”), absent which the Court would allow the claim in the amount recommended by the Trustee.¹

¹ In the event a Participant timely contested the proposed claim disposition in either the First Notice or the Second Notice and the matter could not be consensually resolved, the Claims Procedure Order provided

13. On August 24, 2018, the Trustee delivered a First Notice to Mr. Reis. The First Notice was sent to the Email Address. *See Declaration of Tinamarie Feil*² *in Support of the Objection by Trustee to Motion to Reinstate Claim* (the “Affidavit”), attached as Exhibit “B”, which includes a copy of the First Notice. Mr. Reis did not respond to the First Notice.

14. On November 26, 2018, the Trustee delivered the Second Notice to Mr. Reis. The Second Notice was sent to the Email Address. *See Declaration of Jeffrey Miller*³ *in Support of the Objection by Trustee to Motion to Reinstate Claim* (the “Affidavit”), attached as Exhibit “C”, which includes a copy of the Second Notice filed with the Court [docket no. 1116].

15. There is no question that Ms. Reis had actual notice of the First Notice and the Second Notice. The Motion to Reinstate does not contest this, stating only that Mr. Reis does not recall receiving the notices but acknowledging that he may have received them.

Argument

16. The Motion to Reinstate does not articulate any legal authority or standard by which the motion could be allowed.

17. Mr. Reis cannot satisfy the requirements for allowance of a motion for reconsideration of the order disallowing his claim. A motion to reconsider must be filed within the time for filing an appeal of the order disallowing the claim, or fourteen (14) days from the disallowance of his claim. *See Federal Rule of Bankruptcy Procedure 8002(b)(1); In re Traversa*, 371 B.R. 1, 3 (D. Conn. 2007). The Motion to Reinstate, having been filed nearly two years after disposition of the claim, is untimely. Moreover, to prevail on a motion for

that the Trustee would file an omnibus objection to claims, with up to 250 claims per objection, for resolution by the Court.

² Tinamarie Feil is employed by BMC Group, which has served as the Trustee’s claims agent.

³ Jeffrey Miller is employed by Kurtzman Carson Consultants LLC, which has served as the Trustee’s claims agent.

reconsideration, the moving party “must show newly discovered evidence or a manifest error of fact or law.” *In re Wedgestone Financial*, 142 B.R. 7 (Bankr. D. Mass. 1992). Mr. Reis has not demonstrated any new evidence that he was not capable of producing at the time of the disallowance of his claim, nor any manifest errors of fact or law in connection with the disallowance of the claim.

18. Similarly, Mr. Reis cannot satisfy the requirements for relief from the order under Federal Rule of Civil Procedure 60, incorporated by Federal Rule of Bankruptcy Procedure 9024. To the extent that the movant seeks relief under Rule 60(b)(1), (2), or (3), such relief must be sought no more than one year after entry of the challenged order. Because Mr. Reis waited nearly two years to file the Motion to Reinstate, there is no basis to consider relief under these sections.

19. Rule 60(b)(4) and (b)(5) are not applicable to this case.⁴ The only other basis for relief would be under Rule 60(b)(6), which allows for relief from judgment for “any other reason that justifies relief”. Rule 60(b)(6) is reserved for extraordinary circumstances that justify extraordinary relief. *In re Lafata*, 344 B.R. 715, 722 (1st Cir. B.A.P. 2006), *citing Valley Citizens for a Safe Environment v. Aldridge*, 969 F.2d 1315, 1317 (1st Cir. 1992). Mr. Reis cannot provide support for such extraordinary relief under these circumstances.

20. Mr. Reis was given two opportunities to respond to issues raised respecting his claim and failed to do so. Mr. Reis then waited nearly two years to address the disallowance of his claim. Under such circumstances, no grounds exist for relief under Rule 60(b)(6). *See In re Rodriguez Gonzales*, 396 B.R. 790 (1st Cir. B.A.P. 2008)(Rule 60(b)(6) relief appropriate only

⁴ Rule 60(b)(4) pertains to a judgement that is void. Rule 60(b)(5) pertains to a judgment that has been satisfied, released, or discharged; that is based on an earlier judgment that has been reversed or vacated; or for which application of the judgment prospectively would no longer be equitable.

when the movant was not at fault in his predicament and was unable to take steps to prevent the judgment from which relief is sought).

21. Mr. Reis' lack of business sophistication or language barriers are no different than that experienced by many of the Participants in these cases who managed to timely file claims and timely respond to the Trustee's objections to claims. There would be prejudice to the TelexFree estates if the Motion to Reinstate were to be approved because the Plan is a pot plan, the Trustee has already computed the availability of funds to make a distribution based upon the potential pool of allowed claims, and the initial distribution has already been made. If the Motion to Reinstate were approved, and other non-filing Participants were to submit similar requests for relief, the pool of potentially allowable claims could expand significantly, impairing the recovery provided for Participants under the Plan.

22. Based upon the foregoing, the Liquidating Trustee of the Reorganized Debtors requests that the Court deny the Motion to Reinstate and grant such other relief as is just and proper.

Respectfully Submitted,
STEPHEN B. DARR,
LIQUIDATING TRUSTEE OF TELEXFREE INC.,
TELEXFREE LLC, AND TELEXFREE
FINANCIAL, INC.,
By his attorneys,

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

Dated: August 6, 2020
783643

United States Bankruptcy Court District of Massachusetts

Case No. 14-40987-MSH, 14-40988-MSH, 14-40989-MSH

Claim Information for TelexFree Claim Number: 66876

Name of Creditor: Edivaldo Alves Reis

Date Claim Filed: 14 September, 2016

Name and address where information should be sent

Name and address where payment should be sent

Edivaldo Alves reis
9 BLACKSMITH WAY
SAUGUS, MA United States of America (USA) 01906-4439
baiakclean@yahoo.com
6175907401

Edivaldo Alves reis
9 BLACKSMITH WAY
SAUGUS, MA United States of America (USA) 01906-4439
baiakclean@yahoo.com
6175907401

Information Declared as True and Correct:

User Account Logins	Net Equity per TelexFree	Transaction Adjustments by Participant	Additional (Disputed) Claim Amount	Amount of Claim as of Date Case Filed
[Unknown]	\$ 0.00	\$ 0.00	\$ 345,000.00	\$ 345,000.00
Total	\$ 0.00	\$ 0.00	\$ 345,000.00	\$ 345,000.00

Amount of Claim Submitted: \$ 345,000.00

Documents Uploaded

File Name	Description
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Please print a copy for your records

www.telexfreeclaims.com

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

**Declaration of Tinamarie Feil in Support of Objection
to Motion to Reinstate Proof of Claim Filed for Edivaldo Alves Reis**

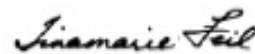
I, Tinamarie Feil, state as follows:

1. I am over eighteen years of age and I believe the statements contained herein are true based on my personal knowledge. My business address is c/o BMC Group, Inc., 3732 West 120th Street, Hawthorne, California 90250.

2. BMC Group has assisted the Trustee in this matter with technology platforms and electronic service of notices.

3. Attached as Exhibit A is a true and correct print-out of an archived copy of the e-mail sent to baiakclean@yahoo.com from claimresponse@telexfreeclaims.com on August 23, 2018. I have reviewed the archive's undeliverable notifications and find no evidence of failure to deliver the referenced email.

Dated August 6, 2020



Tinamarie Feil

EXHIBIT A

TelexFree Claim No. 66876-000 Notice of Proposed Resolution of Claim

①

 Translate message to: English | Never translate from: Spanish

C 

ClaimResponse
Thu 8/23/2018 7:06 AM
To: baiakclean@yahoo.com

Notice of Proposed Resolutio...
1 MB

Exhibit A-1 Claim No. 66876-...
86 KB

2 attachments (1 MB) Download all Save all to OneDrive - BMC Group

Dear TelexFree Claimant:

You are receiving this email because the Trustee has reviewed your Claim and has proposed allowing your Claim in an amount different from the amount set forth in the Claim that you filed. If you filed more than one Claim you may receive more than one email.

Attached are the following related to your TelexFree Claim:

1. Notice of Proposed Resolution of Claim in English, Spanish and Portuguese

2. Exhibits A and A-1 to the Notice of Proposed Resolution of Claim

The Notice of Proposed Resolution of Claim provides important information regarding the process for contesting the Trustee’s proposed claim resolution. Exhibit A-1 identifies the amount of your Claim as filed, the proposed conditionally allowed amount of your Claim, and the specific objections that apply to the Claim. For reference, the TelexFree claims register can be located at this link: [\[registry.telexfreeclaims.com\]](http://registry.telexfreeclaims.com)registry.telexfreeclaims.com

Estimado Demandante de TelexFree:

Le enviamos el presente correo electrónico debido a que el Síndico revisó su Demanda, y ha propuesto que esta se admita por un monto diferente al establecido en la Demanda que usted presentó. Si presentó más de una Demanda, es posible que reciba más de un correo electrónico.

Anexo encontrará los siguientes documentos relacionados con su Demanda a TelexFree:

1. Aviso de Propuesta de Resolución de la Demanda redactado en inglés, español y portugués

2. Anexos A y A-1 al Aviso de Propuesta de Resolución de la Demanda

El Aviso de Propuesta de Resolución de la Demanda ofrece información importante respecto al proceso para impugnar la resolución a la demanda propuesta por el Síndico. El Anexo A-1 identifica el monto de su Demanda como la presentó, el monto condicionalmente permitido de su Demanda y las objeciones específicas que aplican a su Demanda. A modo de referencia, puede encontrar el registro de demandas a TelexFree en el siguiente vínculo: [\[registry.telexfreeclaims.com\]](http://registry.telexfreeclaims.com)registry.telexfreeclaims.com

Prezado Requerente da TelexFree:

Você está recebendo este e-mail porque o Administrador avaliou sua Reivindicação e propôs de validar sua Reivindicação a um valor diferente do valor que consta na Reivindicação que você protocolou. Se você protocolou mais de uma Reivindicação, poderá receber mais de um e-mail.

Em anexo estão os seguintes documentos relacionados à sua Reivindicação da TelexFree:

1. Notificação de Proposta de Resolução de Reivindicação em inglês, espanhol e português

2. Anexos A e A-1 à Notificação de Proposta de Resolução de Reivindicação

A Notificação de Proposta de Resolução de Reivindicação fornece informações importantes sobre o processo de contestação da resolução de Reivindicação proposta pelo Administrador. O Anexo A-1 identifica o valor de sua Reivindicação conforme protocolado, o valor proposto condicionalmente permitido de sua Reivindicação e as objeções específicas que se aplicam à Reivindicação. Para referência, o registro de reclamações da TelexFree pode ser localizado através deste link: [\[registry.telexfreeclaims.com\]](http://registry.telexfreeclaims.com)registry.telexfreeclaims.com

Reply

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Forward

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

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
	)	

NOTICE OF PROPOSED RESOLUTION OF CLAIM

THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS. PLEASE READ IT CAREFULLY.

Dear TelexFree Claimant:

You are receiving this Notice of Proposed Resolution of Claim (“Notice”) because you purchased one or more membership or phone plans from TelexFree (thereby making you a “Participant” for purposes of these Procedures) and you filed one or more claims in the TelexFree bankruptcy cases. The Trustee has reviewed the claim(s) and determined that there are certain deficiencies in your claim(s), and the Trustee has proposed allowance of the claim(s) in an amount different from the amount in the claim(s) that you filed. Set forth below is a summary of the Trustee’s determination and your rights.

Stephen B. Darr, the Chapter 11 bankruptcy trustee (the “Trustee”) of TelexFree LLC, TelexFree Inc., and TelexFree Financial Inc. (together, “TelexFree”) has reviewed the claim(s) (the “Claim”) that you filed with the electronic claims portal (the “Portal”) hosted by the internet site **telexfreeclaims.com**. Based upon this review, the Trustee has concluded that your Claim does not fully comply with the Net Equity formula¹ as approved by the Court for one or more reasons and proposes an adjustment to the Claim. Exhibit “A” to this Notice provides a

¹ The Net Equity formula provided for the following:

- (i) in determining the amount of a Participant’s claim, any claim or portion of claim based upon accumulated credits in a Participant’s User Accounts as of the Petition Date shall be disallowed;
- (ii) Participant Claims shall be computed as follows: the amount invested by the Participant into the Debtors’ scheme, including amounts paid pursuant to Triangular Transactions, less amounts received by the Participant from the Debtors’ scheme, including amounts received pursuant to Triangular Transactions;
- (iii) In determining the amount of a claim of a Participant who has more than one User Account, the activity in all of the Participant’s User Accounts shall be aggregated and netted against one another.

description of the types of objections that may apply and information or documentation that may assist in resolving the objections. Exhibit “A-1” identifies the amount of your claim as filed (see “Amount of Claim Filed with Portal”), the proposed allowed amount of your Claim (see “Conditionally Allowed Amount of Claim”) and the specific objections that apply to each Claim. Included as part of Exhibit A-1 is a schedule translating headings into English, Spanish, and Portuguese. A separate Exhibit A-1 is attached for each Claim.

THE “CONDITIONALLY ALLOWED AMOUNT OF CLAIM” AS SET FORTH ON EXHIBIT A-1 DOES NOT REPRESENT THE AMOUNT YOU WILL RECEIVE ON ACCOUNT OF YOUR CLAIM; IT REPRESENTS THE AMOUNT OF YOUR CLAIM THAT MAY PARTICIPATE IN A DISTRIBUTION WITH OTHER ALLOWED PARTICIPANT CLAIMS. THE AMOUNT THAT YOU ACTUALLY RECEIVE IN A DISTRIBUTION WILL BE BASED UPON THE TOTAL AMOUNT OF FUNDS THAT THE TRUSTEE HAS AVAILABLE TO DISTRIBUTE AS WELL AS THE TOTAL AMOUNT OF ALLOWED PARTICIPANT CLAIMS.

Your Right to Object.

The Trustee’s determination is based upon the Trustee’s current information and the information you submitted in your Claim. You have the right to object to this determination. If you disagree with the proposed claim resolution, you must file a written response (a “Claim Response”) in the manner described below within thirty (30) days of the date of receipt of this Notice. The Claim Response should NOT be filed with the Bankruptcy Court. It should be sent electronically to the Trustee at the following address:

ClaimResponse@TelexFreeClaims.com

To object, you must: (i) identify your Name and Claim Number as set forth above; (ii) provide a statement of the reasons for your objection to this proposed claim resolution and match your statement to the specific Reference Numbers on Exhibit A-1; (iii) submit copies of any documents that you rely upon that were not previously uploaded as part of your Claim; and (iv) identify your Name and Claim number and how to contact you by telephone and electronic mail. You should respond directly to the email message that is sent to you regarding your claim. If you are not replying directly to the email that you received, you **must** include your claim number in the subject line of your email. Your response should be in English. If your response is sent in another language, you **must** provide with the Claim Response a certified translation into English prepared by an interpreter certified by the Administrative Office of the United States Courts

If you submit a Claim Response within 30 days of the date of receipt of this Notice, the Trustee will review the information that you have provided and will take one of three actions:

- (i) The Trustee may accept your response and allow your claim in the amount submitted through the Portal;
- (ii) The Trustee may propose a different amount to be allowed as your claim; or
- (iii) The Trustee may reject your explanation and documents and file a formal objection with the Bankruptcy Court. In such event, you will have an opportunity to file a response with the Court and have an opportunity to be heard. If you fail

to file a response to the Trustee's formal objection with the Bankruptcy Court, the Trustee may request that the Court approve the Conditionally Allowed Amount of Claim.

If you do not file a timely Claim Response, the Trustee may request that the Court approve the Conditionally Allowed Amount of Claim.

If you Agree with the Proposed Resolution of Claim.

If you agree with this determination, you may either notify the Trustee at the electronic mail address listed above or take no further action.

If, at the conclusion of this process, you have an allowed Participant claim, you will be notified at the appropriate time when funds are available for distribution.

If you have additional claims that are not addressed in the attached exhibits, you will be notified at the appropriate time of the Trustee's proposed disposition of such claims.

Respectfully Submitted,
STEPHEN B. DARR,
CHAPTER 11 TRUSTEE,
By his counsel,

Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107

EXHIBIT "A"

Objection Codes (see Exhibit A-1 for list of those objections that apply to your claim).

Objection Code	Explanation of Objection	Documents or Information to Provide in Response to Objection
Duplicate	The Trustee has determined that the Claim is duplicative of a later filed Claim by the Participant. The Trustee proposes to disallow the Claim.	Provide documentation demonstrating that the Claim is not a duplicate of the later filed Claim.
A	<u>Multiple Participants Claimed Same User Account</u> Multiple Participants have claimed ownership of 1 or more of the same User Accounts (a User Account is the account established in the TelexFree recordkeeping system when a Participant purchased a membership or phone plan).	Provide documentation that shows that you are the owner of the User Account identified on Exhibit A-1. Documentation may include correspondence to or from TelexFree regarding the User Accounts or payment records from the purchase of the User Accounts.
B	<u>User Account(s) Deleted Without Adequate Explanation or Documentation</u> Participant entered information into the Portal (e.g., name, phone number, email address, etc.) which resulted in certain User Accounts being associated with Participant based on TelexFree's records. Participant deleted one or more of those User Account without adequate explanation or documentation.	Provide evidence that the deleted User Account does not belong to the Participant. The deleted User Accounts are itemized on Exhibit A-1.
C	<u>User Account(s) Added Without Adequate Explanation or Documentation</u> Participant added User Account(s) not associated with them in TelexFree records. Participant did not provide adequate explanation or documentation to support the addition of the User Account(s).	Provide documentation that shows that Participant is the owner of the User Account(s). Documentation may include correspondence to or from TelexFree regarding the User Account(s) or payment records from the purchase of the User Accounts. Also supply as many identifiers as possible that were used by you when opening the User Account(s) to establish that the User Account(s) belongs to you. Added User Account(s) are itemized on Exhibit A-

1.

- | | | |
|---|--|--|
| D | <p><u>Transactions Modified Without Adequate Explanation or Documentation</u></p> <p>The Portal required Participants to identify all User Accounts belonging to the Participant. The Participant was then presented with all Net Equity transactions associated with those User Account(s) in TelexFree's records. Participant changed the amount of transaction(s) without adequate explanation or documentation.</p> | <p>Provide documents showing amounts paid or received to support the transaction adjustment(s) and the User Account to which it relates. The modified transaction(s) are itemized on Exhibit A-1.</p> |
| E | <p><u>Transactions Added Without Adequate Explanation or Documentation</u></p> <p>The Portal required Participants to identify all User Accounts belonging to the Participant. The Participant was then presented with all Net Equity transactions associated with those User Account(s) in TelexFree's records. Participant added a transaction not reflected in TelexFree's records without providing adequate explanation or documentation.</p> | <p>Provide documents supporting the added transaction and the User Account to which it relates. The added transaction(s) are itemized on Exhibit A-1.</p> |
| F | <p><u>Additional Claim Component Added Without Adequate Explanation or Documentation</u></p> <p>Participant adjusted the amount of claim based on transactions not consistent with the Net Equity formula without providing adequate explanation or documentation.</p> | <p>Documents evidencing payment(s) to TelexFree or to another Participant for the purchase of a membership or phone plan and any associated User Account. The additional claim components are itemized on Exhibit A-1.</p> |
| G | <p><u>Damages Not Included in Net Equity</u></p> <p>Participant asserted other damages not included in Net Equity formula.</p> | <p>If claims are not based on Net Equity formula, this portion of the Claim will be disallowed. The asserted damages are itemized on Exhibit A-1.</p> |

**TRIBUNAL DE QUIEBRAS DE LOS ESTADOS UNIDOS DE NORTEAMÉRICA
DISTRITO DE MASSACHUSETTS**

En el asunto de:	)	
	)	
	)	Capítulo 11
	)	
TELEXFREE, LLC,	)	No. de expediente 14-40987-MSH
TELEXFREE, INC.,	)	No. de expediente 14-40988-MSH
TELEXFREE FINANCIAL, INC.,	)	No. de expediente 14-40989-MSH
	)	
Deudores.	)	Administrados en conjunto
	)	

AVISO DE PROPUESTA DE RESOLUCIÓN DE LA DEMANDA

ESTE AVISO PUEDE AFECTAR SUS DERECHOS. Léalo con atención.

Estimado Participante:

El presente Aviso de Propuesta de Resolución de la Demanda (el “Aviso”) se debe a que usted compró una o más membresías o planes telefónicos de TelexFree (lo cual lo convierte en un “Participante” para los fines de estos Procedimientos), y usted presentó una o más demandas en los casos de quiebra de TelexFree. El Síndico ha revisado la(s) demanda(s) y determinó que existen ciertas deficiencias en ella(s); el Síndico ha propuesto la concesión de la(s) demanda(s) por un monto diferente al que aparece en la(s) demanda(s) que usted entabló. A continuación, se presenta un resumen de la determinación del Síndico y de sus derechos.

Stephen B. Darr, síndico en quiebra, conforme al Capítulo 11 (el “Síndico”) de TelexFree LLC, TelexFree Inc., y TelexFree Financial Inc. (en conjunto, “TelexFree”) ha revisado la(s) demanda(s) (la “Demanda”) que usted presentó en el portal de demandas electrónicas (el “Portal”) albergado en el sitio de internet **telexfreeclaims.com**. Con base en dicha revisión, el Síndico concluyó que su Demanda no cumple cabalmente con la fórmula de Capital Neto¹

¹ La fórmula de Capital Neto se proporciona con el siguiente fin:

- (i) Al determinar el monto de la demanda del Participante, se rechazará cualquier demanda o porción de demanda con base en los créditos acumulados en las Cuentas de Usuario de un Participante a la Fecha de Petición;
- (ii) Las Demandas de los Participantes se calcularán de la siguiente forma: el monto invertido por el Participante en el esquema de Deudores, incluidos los montos pagados conforme a las Transacciones Triangulares, menos los montos recibidos por el Participante del esquema de Deudores, que incluye los montos recibidos conforme a Transacciones Triangulares;
- (iii) Al determinar el monto de una demanda de un Participante que tiene más de una Cuenta de Usuario, se sumará y totalizará la actividad neta de todas las Cuentas de Usuario del Participante una contra otra.

aprobada por el Tribunal, por uno o más motivos, y propone un ajuste a la Demanda. El Anexo “A” de este Aviso contiene una descripción de los tipos de objeciones que pueden corresponder y la información o documentación que podría ayudar a conciliar las objeciones. El Anexo “A-1” identifica el monto de su demanda como la entabló (consulte el “Monto de la Demanda presentada en el Portal”), el monto permitido que se propone para su Demanda (consulte el “Monto Condicionalmente Permitido de la Demanda”) y las objeciones específicas que aplican a cada Demanda. Como parte del Anexo A-1, se incluye una lista que traduce los encabezados al inglés, al español y al portugués. Asimismo, se agrega un Anexo A-1, por separado, para cada Demanda.

EL “MONTO CONDICIONALMENTE PERMITIDO DE LA DEMANDA” ESTIPULADO EN EL ANEXO A-1 NO REPRESENTA EL MONTO QUE USTED RECIBIRÁ A CUENTA DE SU DEMANDA; REPRESENTA EL MONTO DE SU DEMANDA QUE PUEDE PARTICIPAR EN UNA DISTRIBUCIÓN CON OTRAS DEMANDAS DE PARTICIPANTES PERMITIDOS. EL MONTO QUE USTED RECIBIRÁ, EN REALIDAD, EN UNA DISTRIBUCIÓN SE BASARÁ EN EL MONTO TOTAL DE FONDOS QUE EL SÍNDICO TENGA A SU DISPOSICIÓN PARA DISTRIBUIRLOS, ASÍ COMO EL MONTO TOTAL DE LAS DEMANDAS DE PARTICIPANTES PERMITIDOS.

Su Derecho de Objetar.

La determinación del Síndico se basa en la información actual del Síndico y la información que usted entregó junto con su Demanda. Usted tiene derecho de objetar a esta determinación. Si usted no está de acuerdo con la propuesta de resolución de la demanda, debe presentar una respuesta por escrito (una “Respuesta a la Demanda”) de la manera descrita a continuación en un lapso de 30 (treinta) días a partir de la fecha en que reciba este Aviso. La Respuesta a la Demanda NO debe presentarse ante el Tribunal de Quiebras. Debe enviarse por algún medio electrónico al Síndico a la siguiente dirección:

ClaimResponse@TelexFreeClaims.com

Para presentar su objeción, usted debe: (i) identificar su Nombre y Número de Demanda según se indican al principio de este documento; (ii) declarar los motivos de su objeción a esta propuesta de resolución de la demanda y relacionar su declaración con los números específicos de Referencia en el Anexo A-1; (iii) presentar copias de cualesquier documentos en los que usted se base y que no hayan sido cargados previamente como parte de su Demanda; e (iv) identificar su Nombre y Número de Demanda y la forma de ponerse en contacto con usted vía telefónica y por correo electrónico. Usted debe responder directamente al mensaje del correo electrónico que se le envíe con respecto a su demanda. Si no responde directamente al correo electrónico que reciba, **debe** incluir su número de demanda en la línea del asunto del correo electrónico que envíe. Debe presentar su respuesta en inglés. Si envía su respuesta en otro idioma, **debe** entregar una traducción certificada al inglés con la Respuesta a la Demanda elaborada por un intérprete certificado por la Oficina Administrativa de los Tribunales de los Estados Unidos.

Si usted presenta una Respuesta a la Demanda en un lapso de 30 (treinta) días a partir de la fecha en que reciba este Aviso, el Síndico revisará la información que usted haya proporcionado y tomará una de las siguientes tres medidas:

- (i) El Síndico puede aceptar su respuesta y permitir su demanda por el monto presentado a través del Portal;
- (ii) El Síndico puede proponer que se le permita un monto diferente como parte de su demanda; o
- (iii) El Síndico puede rechazar su explicación y documentos y presentar una objeción formal ante el Tribunal de Quiebras. En tal caso, usted tendrá una oportunidad para presentar una respuesta ante el Tribunal y tendrá la oportunidad de ser escuchado. Si no presenta una respuesta a la objeción formal del Síndico ante el Tribunal de Quiebras, el Síndico podrá solicitar que el Tribunal apruebe el Monto Condicionalmente Permitido de la Demanda.

Si no presenta una Respuesta a la Demanda de manera oportuna, el Síndico podrá solicitar que el Tribunal apruebe el Monto Condicionalmente Permitido de la Demanda.

Si está de acuerdo con la Propuesta de Resolución de la Demanda.

Si está de acuerdo con esta determinación, puede notificarlo al Síndico enviándole un correo electrónico a la dirección antes mencionada o simplemente no realizar ninguna otra acción.

Si, al final de este proceso, usted tiene una demanda de Participante permitido, se le notificará en el momento adecuado, cuando los fondos estén disponibles para su distribución.

Si usted tiene demandas adicionales que no se hayan mencionado en los Anexos, recibirá una notificación en el momento oportuno con la disposición propuesta por el Síndico para tales demandas.

Presentado respetuosamente,
STEPHEN B. DARR,
SÍNDICO CONFORME AL CAPÍTULO 11
Por su abogado,

Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107

ANEXO “A”

Claves de objeción (consulte la lista de las objeciones que aplican a su demanda en el Anexo A-1).

Objeción	Clave de explicación de la objeción	Documentos o Información que se debe proporcionar al responder a la Objeción
Duplicado	El Síndico ha determinado que la Demanda se duplica con una Demanda que el Participante presentó posteriormente. El Síndico propone rechazar la Demanda.	Entregue documentación que compruebe que la Demanda no es un duplicado de la Demanda que presentó posteriormente.
A	<u>Varios Participantes Demandaron con la misma Cuenta de Usuario</u> Varios Participantes han declarado ser propietarios de 1 o más cuentas del mismo Usuario (una Cuenta de Usuario es la cuenta que se estableció en el sistema de registro de TelexFree cuando un Participante compró una membresía o plan telefónico).	Entregue documentación que demuestre que usted es el propietario de la Cuenta de Usuario identificada en el Anexo A-1. La documentación puede incluir correspondencia enviada o recibida de TelexFree con respecto a las Cuentas de Usuario o los registros de pago por la compra de las Cuentas de Usuario.
B	<u>Cuenta(s) de Usuario Eliminada(s) sin Explicación o Documentación Adecuadas</u> El Participante capturó información en el Portal (p. ej. nombre, número telefónico, dirección de correo electrónico, etc.) que ocasionó que ciertas Cuentas de Usuario se relacionaran con el Participante con base en los registros de TelexFree. El Participante eliminó una o más de esas Cuentas de Usuario sin una explicación o documentación adecuadas.	Entregue pruebas de que la Cuenta de Usuario eliminada no pertenece al Participante. Las Cuentas de Usuario eliminadas se desglosan en el Anexo A-1.
C	<u>Cuentas de Usuario Agregadas sin Explicación o Documentación Adecuadas</u> El Participante añadió Cuentas de Usuario no relacionadas consigo mismo en los registros de TelexFree. El Participante no ofreció una explicación o documentación adecuadas para respaldar la adición de las Cuentas de Usuario.	Entregue documentación que demuestre que el Participante es el propietario de la(s) Cuenta(s) de Usuario. La documentación puede incluir correspondencia enviada o recibida de TelexFree con respecto a la(s) Cuenta(s) de Usuario o los registros de pago por la compra de las Cuentas de

Usuario. Proporcione también todos los identificadores que le sea posible, los cuales haya utilizado cuando abrió la(s) Cuenta(s) de Usuario para establecer que le pertenece(n) esa(s) Cuenta(s) de Usuario. La(s) Cuenta(s) de Usuario agregadas se desglosan en el Anexo A-1.

- D Transacciones Modificadas sin Explicación o Documentación Adecuadas
El Portal requirió que los Participantes identificarán todas las Cuentas de Usuario que pertenecían al Participante. Entonces, se le presentó al Participante todas las transacciones de Capital Neto relacionadas con esas Cuentas de Usuario en los registros de TelexFree. El Participante cambió el monto de las transacciones sin una explicación o documentación adecuadas.
- E Transacciones agregadas sin Explicación o Documentación Adecuadas
El Portal requirió que los Participantes identificarán todas las Cuentas de Usuario que pertenecían al Participante. Entonces, se le presentó al Participante todas las transacciones de Capital Neto relacionadas con esas Cuentas de Usuario en los registros de TelexFree. El Participante añadió una transacción que no se reflejó en los registros de TelexFree sin ofrecer una explicación o documentación adecuadas.
- F Componente Adicional de la Demanda agregado sin Explicación o Documentación Adecuadas
El Participante ajustó el monto de la demanda con base en transacciones que no están en conformidad con la fórmula de Capital Neto sin ofrecer una explicación o documentación adecuadas.
- Entregue documentos que demuestren los montos pagados o recibidos para respaldar los ajustes a las transacciones y la Cuenta de Usuario con la que se relacionan. Las transacciones modificadas se desglosan en el Anexo A-1.
- Entregue documentos que respalden la transacción agregada y la Cuenta de Usuario con la que se relaciona. La transacción o transacciones agregadas se desglosan en el Anexo A-1.
- Documentos que comprueban los pagos a TelexFree o a otro Participante por la compra de una membresía o plan telefónico y cualquier Cuenta de Usuario relacionada. Los componentes adicionales de la demanda se desglosan en el Anexo A-1.

G	<u>Daños y Perjuicios No Incluidos en el Capital Neto</u> El Participante reivindicó otros daños y perjuicios que no están incluidos en la fórmula de Capital Neto.	Si las demandas no se basan en la fórmula de Capital neto, esta parte de la Demanda no se autorizará. Los daños y perjuicios reivindicados se desglosan en el Anexo A-1.
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**TRIBUNAL DE FALÊNCIA DOS ESTADOS UNIDOS
DISTRITO DO MASSACHUSETTS**

Assunto:	)	
	)	
	)	Falência “Chapter 11”
	)	
TELEXFREE, LLC,	)	Caso No. 14-40987-MSH
TELEXFREE, INC.,	)	Caso No. 14-40988-MSH
TELEXFREE FINANCIAL, INC.,	)	Caso No. 14-40989-MSH
	)	
Devedores.	)	Administrados em conjunto
	)	

NOTIFICAÇÃO DE PROPOSTA DE RESOLUÇÃO DE REIVINDICAÇÃO

*ESTA NOTIFICAÇÃO PODE AFETAR SEUS DIREITOS LEGAIS. POR FAVOR, LEIA
CUIDADOSAMENTE.*

Prezado Requerente da TelexFree:

Você está recebendo esta Notificação de Proposta de Resolução de Reivindicação ("Notificação") porque você comprou um ou mais planos de adesão ou de serviço de telefonia da TelexFree (tornando-o um "Participante" para os propósitos desses Processos) e registrou uma ou mais reivindicações nos casos de falência da TelexFree. O Administrador reviu a(s) reivindicação(ões) e determinou que há certas deficiências na(s) sua(s) reivindicação(ões), e o Administrador propôs uma concessão da(s) reivindicação(ões) em um valor diferente do valor que consta na(s) reivindicação(ões) que você protocolou. A seguir, apresentamos um resumo da determinação do Administrador e dos seus direitos.

Stephen B. Darr, o administrador fiduciário dos procedimentos de falência “Chapter 11” (o “Administrador”) da TelexFree LLC, TelexFree Inc. e TelexFree Financial Inc. (conjuntamente, “TelexFree”) analisou a(s) reivindicação(ões) (a “Reivindicação”) que você protocolou pelo portal eletrônico de reivindicações (o “Portal”), hospedado no site da internet **telexfreeclaims.com**. Com base nessa revisão, o administrador concluiu que a sua reivindicação não está em total conformidade com a fórmula de Patrimônio Líquido.¹ aprovada

¹ A fórmula do Patrimônio Líquido previa o seguinte:

- (i) na determinação do valor da reivindicação de um Participante, qualquer reivindicação ou porção da reivindicação baseada em créditos acumulados nas Contas de Usuário do Participante a partir da Data da Petição não serão acatadas;
- (ii) As Reivindicações dos Participantes serão calculadas da seguinte forma: o montante investido pelo Participante no esquema dos Devedores, incluindo os valores pagos de acordo com as Operações Triangulares, menos os valores recebidos pelo Participante do esquema dos Devedores, incluindo valores recebidos no âmbito das Operações Triangulares;

pelo Juízo por um ou mais motivos e propõe um ajuste à Reivindicação. O Anexo “A” desta Notificação fornece uma descrição dos tipos de contestação que podem se aplicar e informações ou documentação que podem ajudar a resolver as contestações. O Anexo “A-1” identifica o valor de sua reivindicação conforme protocolado (veja “Valor da Reivindicação Protocolada no Portal”), o valor de sua Reivindicação permitido proposto (consulte “Valor de Reivindicação Condicionalmente Permitido”) e as contestações específicas que se aplicam a cada reivindicação. Está incluída como parte do Anexo A-1 um esquema com traduções dos cabeçalhos em inglês, espanhol e português. Um Anexo A-1 à parte está anexado a cada Reivindicação.

O “VALOR DE REIVINDICAÇÃO CONDICIONALMENTE PERMITIDO”, CONFORME ESTABELECIDO NO ANEXO A-1, NÃO REPRESENTA O MONTANTE QUE VOCÊ RECEBERÁ EM RELAÇÃO À SUA REIVINDICAÇÃO; REPRESENTA O MONTANTE DA SUA REIVINDICAÇÃO QUE PODE PARTICIPAR DE UMA DISTRIBUIÇÃO COM OUTRAS REIVINDICAÇÕES DE PARTICIPANTES PERMITIDOS. O MONTANTE QUE VOCÊ DE FATO RECEBERÁ NA DISTRIBUIÇÃO SERÁ BASEADO NO VALOR TOTAL DOS FUNDOS QUE O ADMINISTRADOR TEM DISPONÍVEL PARA DISTRIBUIR, BEM COMO A QUANTIDADE TOTAL DE REIVINDICAÇÕES PARTICIPANTES PROCEDENTES.

Seu direito a contestar.

A determinação do Administrador baseia-se nas informações atuais do Administrador e nas informações que você protocolou com sua Reivindicação. Você tem o direito de contestar essa determinação. Se você não concordar com a proposta de resolução de reivindicações, deverá apresentar uma resposta por escrito (uma “Resposta de Reivindicação”) da maneira descrita a seguir, num prazo de trinta (30) dias a partir da data de recebimento da presente Notificação. A Resposta de Reivindicação NÃO deve ser protocolada junto ao Tribunal de Falências. Deve ser enviada eletronicamente ao Administrador no seguinte endereço:

ClaimResponse@TelexFreeClaims.com

Para contestar, você deve: (i) identificar seu Nome e Número de Reivindicação, conforme estabelecido acima; (ii) fornecer uma declaração dos motivos pela sua contestação a esta proposta de resolução de reivindicação e alinhar sua contestação com os Números de Referência específicos no Anexo A-1; (iii) enviar cópias de quaisquer documentos comprobatórios que não tenham sido entregues anteriormente como parte de sua Reivindicação; e (iv) identificar seu Nome e Número de Reivindicação e uma forma de entrar em contato por telefone e correio eletrônico. Você deve responder diretamente à mensagem de e-mail enviada a você sobre sua reivindicação. Se você não estiver respondendo diretamente ao e-mail que recebeu, deverá **necessariamente** incluir o número do sua reivindicação na linha de assunto do e-mail. Sua resposta deve ser em inglês. Se a sua resposta for enviada em outro idioma, você deverá **necessariamente** fornecer com a Resposta da Reivindicação uma tradução certificada para o

-
- (iii) Ao determinar o valor de uma reivindicação de um Participante que tenha mais de uma Conta de Usuário, a atividade em todas as Contas de Usuários do Participante será agregada e será calculado o valor líquido entre todas.

inglês, preparada por um intérprete certificado pelo Escritório Administrativo dos Tribunais dos Estados Unidos.

Se você enviar uma Resposta de Reivindicação num prazo de trinta (30) dias a partir da data de recebimento da presente Notificação, o administrador analisará as informações que você forneceu e tomará uma das seguintes três ações:

- (i) O administrador pode aceitar a sua resposta e homologar sua reivindicação no montante informado através do Portal;
- (ii) O administrador pode propor um valor diferente para ser considerado para sua reivindicação; ou
- (iii) O administrador pode rejeitar a sua explicação e documentos e protocolar uma contestação formal junto ao Tribunal de Falências. Nesse caso, você terá a oportunidade de protocolar uma resposta junto ao Tribunal e terá a oportunidade de ser ouvido. Se você não protocolar uma resposta à contestação formal do Administrador perante o Tribunal de Falências, o Administrador poderá solicitar que o Tribunal aprove o Valor da Reivindicação Condicionalmente Permitido.

Se você não enviar uma resposta ao pedido dentro do prazo, o Administrador poderá solicitar que o Tribunal aprove o Valor da Reivindicação Condicionalmente Permitido.

Se você concordar com a Proposta de Resolução de Reivindicação.

Se você concordar com essa determinação, você pode notificar o Administrador no endereço de correio eletrônico informado acima ou não tomar mais nenhuma ação.

Se, na conclusão deste processo, você tiver uma reivindicação de Participante permitida, você será notificado no momento oportuno em que houver fundos disponíveis para distribuição.

Se você tiver reivindicações adicionais que não foram incluídas nos anexos, você será notificado no momento apropriado sobre a disposição proposta pelo Administrador para tais reivindicações.

Respeitosamente,
STEPHEN B. DARR,
ADMINISTRADOR “CHAPTER 11”
Por seu representante,

Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107

ANEXO “A”

Códigos de contestação (veja o Anexo A-1 para uma lista de contestações que se aplicam à sua da reivindicação).

Código da contestação	Explicação da contestação	Documentos ou informações para fornecer em resposta à contestação
Duplicidade	O Administrador determinou que a Reivindicação está em duplicidade com uma Reivindicação posterior protocolada pelo Participante. O Administrador propõe de desautorizar a Reivindicação.	Forneça documentação demonstrando que a Reivindicação não é duplicação da Reivindicação protocolada posteriormente.
A	<u>Mais de um Participante reivindicou a mesma Conta de Usuário</u> Mais de um Participante reivindicou como sendo de sua propriedade uma ou mais das mesmas Contas de Usuário (uma Conta de Usuário é a conta estabelecida no sistema de registros da TelexFree quando um Participante adquiria um plano de adesão ou de serviço telefônico).	Forneça documentação que demonstre que você é o proprietário da Conta de Usuário identificada no Anexo A-1. A documentação pode incluir correspondência para ou da TelexFree referente às Contas de Usuário ou comprovantes de pagamento da compra das Contas de Usuário.
B	<u>Conta(s) de Usuário Excluída(s) sem Explicação ou Documentação Adequada</u> O Participante inseriu informações no Portal (por exemplo, nome, número de telefone, endereço de e-mail etc.) que resultaram na associação de determinadas Contas de Usuários ao Participante com base nos registros da TelexFree. O Participante excluiu uma ou mais dessas Contas de Usuário sem explicação ou documentação adequada.	Forneça evidências de que a Conta de Usuário excluída não pertence ao Participante. As Contas de Usuário excluídas estão listadas no Anexo A-1.
C	<u>Conta(s) de Usuário adicionada(s) sem explicação adequada ou documentação</u> O Participante adicionou uma ou mais Conta(s) de Usuário(s) não associada a ele nos registros do TelexFree. O Participante não forneceu explicação ou documentação comprobatória adequada para a adição da(s) conta(s) de usuário.	Forneça documentação que demonstre que o Participante é o proprietário da Conta de Usuário. A documentação pode incluir correspondência para ou da TelexFree referente à(s) Conta(s) de Usuário ou comprovantes de pagamento da compra das Contas de Usuário. Forneça também o maior número possível de identificadores usados por você ao abrir a(s) conta(s)

de usuário para estabelecer que a(s) conta(s) de usuário pertence(m) a você. A(s) Conta(s) de Usuário adicionadas estão listadas no Anexo A-1.

- D Transações modificadas sem explicação ou documentação adequada
O Portal exigiu que os participantes identificassem todas as Contas de Usuário pertencentes ao Participante. Foram então apresentadas ao Participante todas as transações de patrimônio líquido associadas a essa(s) Conta(s) de Usuário nos registros da TelexFree. O Participante alterou o valor da(s) transação(ões) sem explicação ou documentação adequada.
- E Transações incluídas sem explicação ou documentação adequada
O Portal exigiu que os participantes identificassem todas as Contas de Usuário pertencentes ao Participante. Foram então apresentadas ao Participante todas as transações de patrimônio líquido associadas a essa(s) Conta(s) de Usuário nos registros da TelexFree. O participante incluiu uma transação não refletida nos registros da TelexFree sem fornecer explicação ou documentação adequada.
- F Outros componentes de reivindicação incluído(s) sem explicação adequada ou documentação
O Participante ajustou o valor da reivindicação baseado em transações não consistentes com a fórmula de Patrimônio Líquido, sem fornecer explicação ou documentação adequada.
- Forneça documentação que demonstre os valores pagos ou recebidos para comprovar o(s) ajuste(s) à transação e à Conta do Usuário a que se referem. A(s) Conta(s) de Usuário modificadas estão listadas no Anexo A-1.
- Forneça documentos comprobatórios da transação incluída e a Conta de Usuário à qual ela se refere. A(s) transações incluídas estão listadas no Anexo A-1.
- Documentos que evidenciem pagamento(s) à TelexFree ou a outro Participante pela compra de um plano de adesão ou de serviço telefônico e qualquer Conta de Usuário associada. Os outros componentes de reivindicação estão listados no Anexo A-1.

G	<u>Danos não incluídos no Patrimônio Líquido</u> O Participante afirmou outros danos não incluídos na fórmula do Patrimônio Líquido.	Se as reivindicações não forem baseadas na fórmula do Patrimônio Líquido, essa parte da reivindicação não será homologada. Os danos asseverados estão listados no Anexo A-1.
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TelexFree, LLC, et al.
Exhibit A-1 to Notice of Proposed Resolution of Claim

Name of Creditor: Edivaldo Alves Reis
Claim Number: 66876-000

Amount of Claim Filed with Portal: \$ 345,000.00
Conditionally Allowed Amount of Claim: None
Basis of Reduction in Claim: F

See Attached Reconciliation for Calculation of Conditionally Allowed Amount of Claim

Objection
Code

F Additional Claim Components Added Without Adequate Explanation or Documentation

Ref. #	Amount Claimed	User Account	Creditor's Description
1	\$ 104,019.76	[Unknown]	This Cash was given in Florida. Accounts were made for me by Eliseu Dama.
2	88,830.41	[Unknown]	This was given in cash directly to Julio Silva. Then he opened the account and created log ins for me.
3	112,052.20	[Unknown]	This was given in Florida, also in Cash. She opened the accounts for me.
4	40,097.63	[Unknown]	This was given in Florida in CASH.
	<u>\$ 345,000.00</u>		

Note: Additional supporting explanations and documentation must identify the reference number (Ref. #) of the related item.

Reconciliation of Amount of Claim Filed with Portal to Conditionally Allowed Amount of Claim

Claim 66876-000

Objection Code		Amount
	Amount of Claim Filed with Portal	\$ 345,000.00
A	User Account(s) Claimed by Other Participant(s)	0.00
B	User Account(s) Deleted Without Adequate Explanation or Documentation	0.00
C	User Account(s) Added Without Adequate Explanation or Documentation	0.00
D	Transactions Modified Without Adequate Explanation or Documentation	0.00
E	Transactions Added Without Adequate Explanation or Documentation	0.00
F	Additional Claim Components Added Without Adequate Explanation or Documentation	(345,000.00)
	Add back Duplicate Adjustments in Objection Codes D and A	0.00
	Add back Duplicate Adjustments in Objection Codes E and A	0.00
	Conditionally Allowed Amount of Claim	<u>\$ 0.00</u>

Note

If Conditionally Allowed Amount of Claim is equal to or less than \$0, no claim is allowed ("None").

TelexFree, LLC, et al.
Claim No. 66876-000
Edivaldo Alves Reis

United States Bankruptcy Court District of Massachusetts

Case No. 14-40987-MSH, 14-40988-MSH, 14-40989-MSH

Claim Information for TelexFree Claim Number: 66876

Name of Creditor: Edivaldo Alves Reis

Date Claim Filed: 14 September, 2016

Name and address where information should be sent

Edivaldo Alves reis
9 BLACKSMITH WAY
SAUGUS, MA United States of America (USA) 01906-4439
baiakclean@yahoo.com
6175907401

Name and address where payment should be sent

Edivaldo Alves reis
9 BLACKSMITH WAY
SAUGUS, MA United States of America (USA) 01906-4439
baiakclean@yahoo.com
6175907401

Information Declared as True and Correct:

User Account Logins	Net Equity per TelexFree	Transaction Adjustments by Participant	Additional (Disputed) Claim Amount	Amount of Claim as of Date Case Filed
[Unknown]	\$ 0.00	\$ 0.00	\$ 345,000.00	\$ 345,000.00
Total	\$ 0.00	\$ 0.00	\$ 345,000.00	\$ 345,000.00

Amount of Claim Submitted: \$ 345,000.00

Documents Uploaded

File Name	Description
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Please print a copy for your records

www.telexfreeclaims.com

**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)
	)	

**Declaration of Jeffrey Miller in Support of Objection by Trustee to Motion to
Reinstate Claim**

As referenced in Certificate of Service filed on December 4, 2018, [Docket No. 1127], on November 30, 2018, at my direction and under my supervision, employees of KCC caused the following documents to be served via email upon Edivaldo Alves Reis at baiakclean@yahoo.com.

- **Sixty-Eighth Notice of Claim Disallowance [attached hereto as Exhibit A]; Spanish translation of Notice attached hereto as Exhibit B; Portuguese translation of Notice attached hereto as Exhibit C**

Dated: August 6, 2020

/s/ Jeffrey R. Miller
Jeffrey R. Miller
KCC
222 N Pacific Coast Highway
3rd Floor
El Segundo, CA 90245

Exhibit A

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

	)	
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
	)	

SIXTY-EIGHTH NOTICE OF CLAIM DISALLOWANCE

In accordance with the order (“Order”) dated December 26, 2017 approving the *Motion by Chapter 11 Trustee to Establish Omnibus Procedures for the Resolution of Disputed Participant Claims*, Stephen B. Darr, the duly appointed Chapter 11 trustee (the “Trustee”) of the bankruptcy estates of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the “Debtors” or “TelexFree”), transmitted Notices of Proposed Resolution of Claim to the Participants set forth on Exhibit “A” hereto (the “Exhibit A Participants”). The Exhibit A Participants did not file Claim Responses to the Notices of Proposed Resolution of Claim within thirty (30) days as required by the terms of the Order.

The Exhibit A Participant claims shall be disallowed without further order or notice unless, within twenty-one (21) days of the date hereof, an Exhibit A Participant files with the Court and serves on the Trustee a Claim Response disputing the proposed claim disallowance and demonstrating good cause for failure to timely respond to the Notice of Proposed Resolution of Claim.

Respectfully Submitted,
STEPHEN B. DARR,
CHAPTER 11 TRUSTEE,
By his counsel,

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107
Telephone: (617) 423-0400
ALizotte@murphyking.com

Dated: November 26, 2018
750103

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
65968-000	Ricardo Cruz	United States	\$ 15,500.00	\$ 0.00	
65972-000	Canland Enterprises	United States	14,250.00	0.00	
66008-000	Jose M Chavez	United States	20,000.00	0.00	
66015-000	Denis Anibal Herrera	United States	8,500.00	0.00	
66017-000	Lorena Fernandes	United States	4,225.10	0.00	
66022-000	Vilma Z Alfaro	United States	1,425.00	0.00	
66175-000	Ivania Rodriguez	United States	4,325.00	0.00	2
66761-000	Jaime Ochoa	United States	3,244.90	0.00	
66876-000	Edivaldo Alves Reis	United States	345,000.00	0.00	
67510-000	Nathalie Botbol	United States	1,425.00	0.00	
68134-000	Kennedy Ndamba	United States	3,211.39	0.00	
68522-000	Magalie Simon	United States	3,950.70	0.00	
68905-000	Sovann Chhong	United States	4,682.30	0.00	
69411-000	Carol Njeri Ngunjiri	United States	2,899.90	0.00	
69979-000	So Rathkarin	United States	667.90	0.00	
70084-000	Martin Ventura	United States	20,700.00	0.00	
70164-001	Emmanuel Chikwendu	United States	6,207.13	0.00	
70217-000	Izabella Diniz Fagundes	United States	9,925.10	0.00	
70297-000	Tianny Marmolejos	United States	10,002.80	0.00	
70996-000	Carlos Santos	United States	14,471.51	0.00	
71032-001	George Paretsis	United States	1,474.90	0.00	
71050-000	Karna B Biswa	United States	986.00	0.00	
71051-000	Gustavo Da Silva	United States	2,750.20	0.00	
71108-000	Morena Hossabeth Olivares	United States	5,000.00	0.00	
71153-000	Lubien Alabre	United States	50,000.00	0.00	
71170-000	Javier Hernandez	United States	679.20	0.00	
71187-000	Ruddy Ortiz	United States	8,550.00	0.00	3
71745-000	Alanna Massotti	United States	9,675.60	0.00	
71857-000	Maude Duvivier	United States	340.50	0.00	
72103-000	Farouk Khoury	United States	10,134.23	0.00	
72838-000	Denis E Rubio	United States	28,990.00	0.00	4
73435-000	Jose N Contreras	United States	2,073.70	0.00	5
73706-000	Gilbert Winner	United States	339.00	0.00	
73899-000	Thiago Silva De Souza	United States	4,869.80	0.00	
74539-000	Lucner Charlestra	United States	19,576.20	0.00	
74541-000	Penelope Cornelio	United States	8,000.00	0.00	
74545-000	Mercia Francisca S Rocha	United States	3,344.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
75729-000	Monique Halabi	United States	5,900.00	0.00	
75772-000	Camille Francis	United States	15,000.00	0.00	
75850-000	Michael Ricardo Castro	United States	1,474.90	0.00	
76143-000	Nelson Almada	United States	22,850.00	0.00	
76261-000	Samuel Augusto Saillant	United States	26,176.80	0.00	
76303-000	Claudemir E Sathler	United States	14,250.00	0.00	
76474-000	Ricardo Grossi Pereira	United States	8,864.50	0.00	
76752-000	Jose Belliard	United States	2,800.10	0.00	
76796-000	Leonidas Campos	United States	27,662.96	0.00	
77240-000	Mercedes Acevedo	United States	2,800.10	0.00	
77280-000	Daniel Acevedo	United States	2,850.00	0.00	
77430-000	Rhadassa Zorzal Nicoli	United States	69,707.08	0.00	
77779-000	Ulisses Jose S Rocha	United States	6,194.00	0.00	
78464-000	Ruth Kosta Dhionis	United States	7,065.09	0.00	
78631-000	Leandro G Ferreira	United States	4,358.26	0.00	
79045-000	Ronel Alexis	United States	5,010.10	0.00	
79830-000	Cely Ramos Downing	United States	4,422.00	0.00	
79843-000	Leida Osorio	United States	199.60	0.00	
79924-000	Serxhana Kajtazi	United States	5,755.00	0.00	
80408-000	Vioval Investments C-O Bertilio S Rendon	United States	13,116.90	0.00	
80620-000	Jean Pierre	United States	7,121.00	0.00	
80855-000	Rock Enterprises Corp	United States	11,369.60	0.00	
80929-000	Elias Benito Ramirez	United States	7,500.00	0.00	
81482-000	Lucio Jose Mascena	United States	343,583.80	0.00	
82522-000	Ana Lee Espinal	United States	8,400.00	0.00	
83163-000	Milton De Assis Oliveira	United States	3,078.00	0.00	
83175-000	Aida Luz Arroyo	United States	3,000.00	0.00	
83914-000	Daniel Viana	United States	1,474.90	0.00	
84318-000	Barbara Lauture	United States	339.60	0.00	6
86961-000	Lucas Gomes Brito	United States	27,391.64	0.00	
87140-000	Jose Gamba	United States	5,700.00	0.00	
87642-000	Angel Medina	United States	10,430.00	0.00	
87673-000	Samuel Perez	United States	3,000.00	0.00	
87777-000	Marcho Bazile	United States	5,376.90	0.00	
87803-000	Samantha Marie Nunes	United States	7,000.00	0.00	
88505-000	Gilliard Barbosa	United States	4,275.00	0.00	
88543-000	Brasilmar Santos	United States	12,388.30	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
88579-000	Romina N Montesinos	United States	21,724.30	0.00	
88595-000	Lazaro Antonio Lucas Jr	United States	5,113.60	0.00	
88662-000	Brasimar Santos	United States	12,388.30	0.00	
88937-000	Bruno Ribeiro	United States	2,750.20	0.00	
88952-000	Alceu Venturoso	United States	4,943.80	0.00	
89115-000	Hector Antonio Francisco	United States	6,536.50	0.00	
89156-000	Jesus Antonio Francisco	United States	4,245.20	0.00	
90147-000	Eugenia Panameno	United States	2,850.00	0.00	
90472-000	Rosa Mayra Ortiz	United States	15,000.00	0.00	
90508-000	Wilmer Vicente	United States	9,000.00	0.00	
90537-000	Samuel Vicente Aguirre Vicente Aguirre	United States	15,000.00	0.00	
90546-000	Ivelisse Amador	United States	7,600.00	0.00	
90671-000	Reynold Philemon	United States	9,042.30	0.00	
91064-000	Mayra Patricia Socop Raymundo	United States	670.00	0.00	
91804-000	Alessandro Araujo	United States	4,345.00	0.00	
92147-000	Joao Manuel Teixeira	United States	3,000.00	0.00	
92169-000	Hector Antonio Francisco	United States	1,266.00	0.00	
92189-000	Teosvaldo Alberto Pepin	United States	11,400.00	0.00	
92252-000	Margarete Casita Moura	United States	7,000.00	0.00	
92383-000	Mario R Henriquez	United States	13,137.90	0.00	
92623-000	Douglas Jr Furrier	United States	12,288.50	0.00	
92715-000	Douglas Furrier	United States	12,288.50	0.00	
92883-000	Carmen Yurbania Crespo	United States	99.80	0.00	
93242-000	Carmen	United States	18,791.60	0.00	
93386-000	Yvonne Agudelo	United States	1,425.00	0.00	
93514-000	Carmen Garcia Rosario	United States	18,791.60	0.00	
93651-000	Lucia M Nova	United States	16,500.00	0.00	
94625-000	Raimundo Barreto	United States	10,024.90	0.00	
95543-000	Jose Maria Jorge	United States	106,518.00	0.00	
95619-000	Vania Figueiredo	United States	50,204.50	0.00	
95735-000	Marlos Andreucy Vasselai	United States	31,200.00	0.00	
95826-000	Neide Aparecida Lopes	United States	1,970.30	0.00	
96017-000	Silvia Eunice Reyes	United States	1,524.80	0.00	
96271-000	Carmen Yurbania Crespo	United States	15,675.00	0.00	
96361-000	Maria Lucia Desouza	United States	43,527.89	0.00	
96371-000	Veronica Guadalupe Rodriguez	United States	5,100.00	0.00	
96607-000	Mirian V Pineda	United States	5,700.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
96714-000	Isaac Mainetti	United States	1,425.00	0.00	
96793-000	Marie Renee Joseph	United States	4,000.00	0.00	
97637-000	Alvaro Pedro	United States	45,611.40	0.00	
98272-000	Farina Pereira	United States	14,499.50	0.00	7
98322-000	Fabiano N Pereira	United States	21,524.70	0.00	8
98512-000	Wilck Venancio	United States	24,225.00	0.00	
98558-000	Juan Lau Tam Ore	United States	6,270.80	0.00	
98560-000	Carlos Armando Perez	United States	685.07	0.00	
100122-000	Emerson Conrado Ferraz	United States	11,400.00	0.00	
101284-000	Melvin Eduardo Erazo	United States	15,675.00	0.00	
101599-000	Gabriel Gerhske	United States	4,324.90	0.00	
101677-000	Barbara S Rocha Venturoso	United States	4,614.00	0.00	
102070-000	Luiz Lopes Da Silva Junior	United States	1,474.90	0.00	
102120-000	Ibrahim Abuhasan	United States	3,851.80	0.00	
102318-000	Younes Dif	United States	4,614.60	0.00	
102383-000	Gerlandia Batista Da Silva	United States	1,474.90	0.00	
102452-000	Younes Dif	United States	1,425.00	0.00	
102559-000	Daniel Roca	United States	14,299.90	0.00	
102713-000	Tesera Beatriz Chavez	United States	5,699.19	0.00	
102775-000	Gaida Abuwardeh	United States	49,625.50	0.00	
102789-000	Inias Dorinvil	United States	4,341.40	0.00	
103071-000	Vladimir Abdala	United States	4,324.90	0.00	
103096-000	Vladimir Abdala	United States	1,425.00	0.00	
103236-000	Marc Raphael	United States	3,500.00	0.00	
103301-000	Marcia Reynoso	United States	1,175.50	0.00	
103456-000	Alessandro Oliveira	United States	2,515.80	0.00	
103501-000	Winie D Souza	United States	150.00	0.00	
103760-000	Viguez Odies	United States	339.60	0.00	
104115-000	Carmen Yurbania Familia	United States	18,791.60	0.00	
104381-000	Ruth Kadziyanike	United States	12,600.00	0.00	
104398-000	Carmen Yurbania Crespo Varga	United States	18,791.60	0.00	
104452-000	Katia Batista Alpio	United States	15,525.30	0.00	
104474-000	Victoria Lam	United States	5,700.00	0.00	
104646-000	Duyen Lam	United States	9,725.50	0.00	
104759-000	Victoria Lam	United States	9,725.50	0.00	
104864-000	Carmen Yurbania Crespo Vargas	United States	18,791.60	0.00	
104990-002	Silvia Diaz	United States	7,472.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
105013-000	Franky Rene	United States	4,188.00	0.00	
105014-000	Maria Ferreira	United States	8,137.80	0.00	
105047-000	Silvio Calais	United States	17,349.50	0.00	
105287-000	Selin Ciftci	United States	1,425.00	0.00	
105469-000	Vanessa Rampasio Goncalves	United States	17,017.00	0.00	
105863-000	William Lantigua	United States	16,245.00	0.00	
106083-000	Diego Fernando Canido	United States	5,355.22	0.00	
106193-000	Rushdi Bseiso	United States	31,350.00	0.00	
106239-000	Washington Paiva Neves	United States	4,877.28	0.00	
106284-000	William M Lantigua	United States	16,245.00	0.00	
106478-000	Ruba Bseiso	United States	37,050.00	0.00	
106650-000	Jihad Missaoui	United States	19,725.10	0.00	
106825-000	Veronica Guadalupe Rodriguez	United States	5,749.90	0.00	
107031-000	Walfri Rodriguez	United States	7,075.10	0.00	
107163-000	Wesley Amaro Teixeira	United States	22,522.00	0.00	
107430-000	Xiu Liang	United States	35,965.80	0.00	
107667-000	Xiu Ping Liang	United States	36,873.20	0.00	
108085-000	Cesar Antonio Abreu	United States	27,075.00	0.00	
108505-000	Soem Soram Phoum	United States	8,194.00	0.00	
108539-000	Maria Josefina Cruz	United States	7,000.00	0.00	
108630-000	Domingos Rosa Da Silva	United States	4,324.90	0.00	
108698-000	Christine Moore	United States	9,975.00	0.00	
108709-000	glendalys pena	United States	1,425.00	0.00	9
108728-000	GLENDALYS PENA	United States	1,425.00	0.00	10
108746-000	GLENDALYS PENA	United States	1,425.00	0.00	11
108773-000	GLENDALYS PENA	United States	1,425.00	0.00	12
108783-000	Domingos Dasilva	United States	2,899.90	0.00	
108792-000	GLENDALYS PENA	United States	1,425.00	0.00	13
108809-000	GLENDALYS PENA	United States	1,425.00	0.00	14
108827-000	glendalys pena	United States	1,425.00	0.00	15
108853-000	glendalys pena	United States	1,425.00	0.00	16
108855-000	glendalys pena	United States	1,425.00	0.00	17
108915-000	glendalys pena	United States	1,425.00	0.00	18
109006-000	Fernelis	United States	4,275.00	0.00	
109081-000	Christopher Ginilheu Coimbra	United States	31,400.00	0.00	
109175-000	Jian Liang	United States	29,088.20	0.00	
109244-001	Nagmar Noide De Assis	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
109457-000	Jonathan D Nunez	United States	1,425.00	0.00	
109523-000	Geralda Francisca Antonio	United States	8,599.90	0.00	
109849-000	Seng Phearom	United States	10,018.50	0.00	
109916-000	Ezequiel Gino De Souza	United States	66,619.40	0.00	
110366-000	Shirley Novaes Silva	United States	25,000.00	0.00	
110434-000	Lorgio Antelo Ferrier	United States	10,074.80	0.00	
110491-000	Edson Junio Silva	United States	107,713.90	0.00	
110515-000	Gloriana Dejesus	United States	4,324.90	0.00	
110556-001	Victor Nascimento	United States	5,700.00	0.00	19
110590-000	Edna Anjos Doucette	United States	8,000.00	0.00	
110680-000	Bryan Omar Martinez	United States	13,000.00	0.00	
111194-000	Gray Cordero	United States	1,425.00	0.00	20
111212-000	Gray Cordero	United States	1,425.00	0.00	21
111233-000	Gray Cordero	United States	1,425.00	0.00	22
111261-000	Gray Cordero	United States	1,425.00	0.00	23
111288-000	Gray Cordero	United States	1,425.00	0.00	24
111357-002	Vinicius Munich	United States	36,330.30	0.00	
111488-000	Gray Cordero	United States	1,425.00	0.00	25
111541-000	Maria Do Carmo Murdock	United States	18,259.31	0.00	
111660-000	Gray Cordero	United States	7,125.00	0.00	26
111707-000	Ernesto Menjivar Santeliz	United States	7,963.90	0.00	
111718-000	Renato Magalhaes De Sousa	United States	11.20	0.00	
111970-000	Juan Miguel Dejesus	United States	1,425.00	0.00	
112005-000	Daylson Gomes Deoliveira	United States	2,899.90	0.00	
112026-000	Juan Dejesus	United States	1,425.00	0.00	
112221-000	Lilia Esperanza Ruiz	United States	7,500.00	0.00	
112230-000	Irma Julieta Rodriguez Lopez	United States	5,062.10	0.00	
112246-000	Domingo Javier	United States	1,135.30	0.00	
112392-000	Miky Santiago Gonzales	United States	15,000.00	0.00	
112434-000	Jje Enterprise Corp	United States	10,000.00	0.00	
112506-000	Luis A Morales	United States	113,431.90	0.00	
112531-000	Barbara	United States	339.60	0.00	
112821-000	Carlos Lizardo	United States	3,966.80	0.00	
112865-000	Luis Antonio Morales	United States	113,431.90	0.00	
113073-000	William Clayton De Camargo	United States	24,225.00	0.00	
113446-000	Daniela Catricala	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
114211-000	Miltes Aparecida Barbosa Rabelo Aparecida Barbosa	United States	13,629.90	0.00	
114322-000	Daniel M Sosa	United States	18,537.12	0.00	
114516-000	Ferdinand Polahon Chilagan	United States	3,500.00	0.00	
115036-000	Wellington Leonidas Gonzalez	United States	2,424.99	0.00	
115155-000	Efrian Martinez	United States	8,550.00	0.00	
115190-000	Virgen Gonzalez	United States	3,484.73	0.00	
115272-000	Guadalupe Pineda	United States	31,948.80	0.00	
115315-000	Fabiana Aguar	United States	44,378.60	0.00	
115640-000	Ruthshel Nathanaelle Telus	United States	5,000.00	0.00	
115693-000	Karina Lopez	United States	7,000.00	0.00	
116751-000	Dioselin Jacome	United States	4,275.00	0.00	
116759-000	Andres Gonzalo Cedillo	United States	2,850.00	0.00	
117146-000	Rodrigo T Souza	United States	2,850.00	0.00	
117167-000	Jose Echeverria	United States	31,050.60	0.00	
117177-000	Dario Echeverria	United States	4,324.90	0.00	
117188-000	Hernani Pereira Jorge	United States	52,197.80	0.00	
117263-000	Vilma Isabel Posada	United States	11,449.90	0.00	
117298-000	Densy Fradil Rosa Lora	United States	16,400.00	0.00	
117428-000	Pedro Rodriguez	United States	30,825.70	0.00	
117784-000	Sergio Pereira De Souza	United States	19,452.60	0.00	
117806-000	Cederne Bossuet	United States	2,655.20	0.00	
118144-000	Musa Abuhasan	United States	71,074.20	0.00	
118300-000	Mario A Zavala	United States	13,137.90	0.00	
118348-000	Nuno Miguel Ramos Lopes E Castro	United States	12,389.00	0.00	
118352-000	Rocstilllo	United States	5,550.30	0.00	
118398-000	Aparecida Ferreira Campos	United States	3,636.30	0.00	
118404-000	Dalila Nascimento	United States	8,870.10	0.00	
119282-000	Wilson Michael Solares	United States	3,238.90	0.00	
119362-000	Doris Pujols	United States	190.20	0.00	

Notes

- 1: Country of Residence as entered by Claimant on the claim form filed electronically.
- 2: Claimant Name was identified as "Telexfree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Where Notices Should be Sent" field on the claim form filed electronically.
- 3: Claimant Name was identified as "Telefree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.

[illegible]

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
22:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
23:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
24:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
25:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
26:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				

Exhibit B

**TRIBUNAL DE QUIEBRAS DE ESTADOS UNIDOS DE AMÉRICA
DISTRITO DE MASSACHUSETTS**

En el asunto de:

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

Deudores.

Capítulo 11

No. de expediente 14-40987-MSH

No. de expediente 14-40988-MSH

No. de expediente 14-40989-MSH

Administrados en forma mancomunada

SEXAGÉSIMO OCTAVO AVISO DE IMPROCEDENCIA DE RECLAMO

De conformidad con el acuerdo (“Acuerdo”) de fecha 26 de diciembre de 2017 que aprueba la *Solicitud conforme al Capítulo 11 del Síndico para establecer Procedimientos Omnicomprendivos para la Resolución de los Reclamos de los Participantes en Controversia*, Stephen B. Darr, el síndico debidamente nombrado conforme al Capítulo 11 (el “Síndico”) en la quiebra de TelexFree, LLC, TelexFree, Inc., y TelexFree Financial, Inc. (de manera colectiva, los “Deudores” o “TelexFree”), transmitió los Avisos de Propuesta de Resolución de la Demanda a los Participantes establecidos en el Anexo “A” (los “Participantes mencionados en el Anexo A”) del presente instrumento. Los Participantes mencionados en el Anexo A no presentaron Respuestas a los Avisos de Propuesta de Resolución de la Demanda en un lapso de treinta (30) días conforme a lo requerido por los términos del Acuerdo.

Los reclamos de los Participantes mencionados en el Anexo A no procederán sin que se requiera otro acuerdo o aviso, salvo que, en un lapso de veintiuno (21) días contados a partir de esta fecha, un Participante mencionado en el Anexo A presente ante el Tribunal y notifique a un Síndico sobre una Respuesta a los Reclamos donde se objete la improcedencia del reclamo propuesto y se demuestre una causa justificada para no haber respondido oportunamente al Aviso de Propuesta de Resolución de la Demanda.

Así lo he presentado respetuosamente
STEPHEN B. DARR,
SÍNDICO CONFORME AL CAPÍTULO 11
Por su abogado,

(Firmado) Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107
Teléfono: (617) 423-0400
ALizotte@murphyking.com

Fecha: 26 de noviembre de 2018
749717

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
65968-000	Ricardo Cruz	United States	\$ 15,500.00	\$ 0.00	
65972-000	Canland Enterprises	United States	14,250.00	0.00	
66008-000	Jose M Chavez	United States	20,000.00	0.00	
66015-000	Denis Anibal Herrera	United States	8,500.00	0.00	
66017-000	Lorena Fernandes	United States	4,225.10	0.00	
66022-000	Vilma Z Alfaro	United States	1,425.00	0.00	
66175-000	Ivania Rodriguez	United States	4,325.00	0.00	2
66761-000	Jaime Ochoa	United States	3,244.90	0.00	
66876-000	Edivaldo Alves Reis	United States	345,000.00	0.00	
67510-000	Nathalie Botbol	United States	1,425.00	0.00	
68134-000	Kennedy Ndamba	United States	3,211.39	0.00	
68522-000	Magalie Simon	United States	3,950.70	0.00	
68905-000	Sovann Chhong	United States	4,682.30	0.00	
69411-000	Carol Njeri Ngunjiri	United States	2,899.90	0.00	
69979-000	So Rathkarin	United States	667.90	0.00	
70084-000	Martin Ventura	United States	20,700.00	0.00	
70164-001	Emmanuel Chikwendu	United States	6,207.13	0.00	
70217-000	Izabella Diniz Fagundes	United States	9,925.10	0.00	
70297-000	Tianny Marmolejos	United States	10,002.80	0.00	
70996-000	Carlos Santos	United States	14,471.51	0.00	
71032-001	George Paretsis	United States	1,474.90	0.00	
71050-000	Karna B Biswa	United States	986.00	0.00	
71051-000	Gustavo Da Silva	United States	2,750.20	0.00	
71108-000	Morena Hossabeth Olivares	United States	5,000.00	0.00	
71153-000	Lubien Alabre	United States	50,000.00	0.00	
71170-000	Javier Hernandez	United States	679.20	0.00	
71187-000	Ruddy Ortiz	United States	8,550.00	0.00	3
71745-000	Alanna Massotti	United States	9,675.60	0.00	
71857-000	Maude Duvivier	United States	340.50	0.00	
72103-000	Farouk Khoury	United States	10,134.23	0.00	
72838-000	Denis E Rubio	United States	28,990.00	0.00	4
73435-000	Jose N Contreras	United States	2,073.70	0.00	5
73706-000	Gilbert Winner	United States	339.00	0.00	
73899-000	Thiago Silva De Souza	United States	4,869.80	0.00	
74539-000	Lucner Charlestra	United States	19,576.20	0.00	
74541-000	Penelope Cornelio	United States	8,000.00	0.00	
74545-000	Mercia Francisca S Rocha	United States	3,344.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
75729-000	Monique Halabi	United States	5,900.00	0.00	
75772-000	Camille Francis	United States	15,000.00	0.00	
75850-000	Michael Ricardo Castro	United States	1,474.90	0.00	
76143-000	Nelson Almada	United States	22,850.00	0.00	
76261-000	Samuel Augusto Saillant	United States	26,176.80	0.00	
76303-000	Claudemir E Sathler	United States	14,250.00	0.00	
76474-000	Ricardo Grossi Pereira	United States	8,864.50	0.00	
76752-000	Jose Belliard	United States	2,800.10	0.00	
76796-000	Leonidas Campos	United States	27,662.96	0.00	
77240-000	Mercedes Acevedo	United States	2,800.10	0.00	
77280-000	Daniel Acevedo	United States	2,850.00	0.00	
77430-000	Rhadassa Zorzal Nicoli	United States	69,707.08	0.00	
77779-000	Ulisses Jose S Rocha	United States	6,194.00	0.00	
78464-000	Ruth Kosta Dhionis	United States	7,065.09	0.00	
78631-000	Leandro G Ferreira	United States	4,358.26	0.00	
79045-000	Ronel Alexis	United States	5,010.10	0.00	
79830-000	Cely Ramos Downing	United States	4,422.00	0.00	
79843-000	Leida Osorio	United States	199.60	0.00	
79924-000	Serxhana Kajtazi	United States	5,755.00	0.00	
80408-000	Vioval Investments C-O Bertilio S Rendon	United States	13,116.90	0.00	
80620-000	Jean Pierre	United States	7,121.00	0.00	
80855-000	Rock Enterprises Corp	United States	11,369.60	0.00	
80929-000	Elias Benito Ramirez	United States	7,500.00	0.00	
81482-000	Lucio Jose Mascena	United States	343,583.80	0.00	
82522-000	Ana Lee Espinal	United States	8,400.00	0.00	
83163-000	Milton De Assis Oliveira	United States	3,078.00	0.00	
83175-000	Aida Luz Arroyo	United States	3,000.00	0.00	
83914-000	Daniel Viana	United States	1,474.90	0.00	
84318-000	Barbara Lauture	United States	339.60	0.00	6
86961-000	Lucas Gomes Brito	United States	27,391.64	0.00	
87140-000	Jose Gamba	United States	5,700.00	0.00	
87642-000	Angel Medina	United States	10,430.00	0.00	
87673-000	Samuel Perez	United States	3,000.00	0.00	
87777-000	Marcho Bazile	United States	5,376.90	0.00	
87803-000	Samantha Marie Nunes	United States	7,000.00	0.00	
88505-000	Gilliard Barbosa	United States	4,275.00	0.00	
88543-000	Brasilmar Santos	United States	12,388.30	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
88579-000	Romina N Montesinos	United States	21,724.30	0.00	
88595-000	Lazaro Antonio Lucas Jr	United States	5,113.60	0.00	
88662-000	Brasimar Santos	United States	12,388.30	0.00	
88937-000	Bruno Ribeiro	United States	2,750.20	0.00	
88952-000	Alceu Venturoso	United States	4,943.80	0.00	
89115-000	Hector Antonio Francisco	United States	6,536.50	0.00	
89156-000	Jesus Antonio Francisco	United States	4,245.20	0.00	
90147-000	Eugenia Panameno	United States	2,850.00	0.00	
90472-000	Rosa Mayra Ortiz	United States	15,000.00	0.00	
90508-000	Wilmer Vicente	United States	9,000.00	0.00	
90537-000	Samuel Vicente Aguirre Vicente Aguirre	United States	15,000.00	0.00	
90546-000	Ivelisse Amador	United States	7,600.00	0.00	
90671-000	Reynold Philemon	United States	9,042.30	0.00	
91064-000	Mayra Patricia Socop Raymundo	United States	670.00	0.00	
91804-000	Alessandro Araujo	United States	4,345.00	0.00	
92147-000	Joao Manuel Teixeira	United States	3,000.00	0.00	
92169-000	Hector Antonio Francisco	United States	1,266.00	0.00	
92189-000	Teosvaldo Alberto Pepin	United States	11,400.00	0.00	
92252-000	Margarete Casita Moura	United States	7,000.00	0.00	
92383-000	Mario R Henriquez	United States	13,137.90	0.00	
92623-000	Douglas Jr Furrier	United States	12,288.50	0.00	
92715-000	Douglas Furrier	United States	12,288.50	0.00	
92883-000	Carmen Yurbanía Crespo	United States	99.80	0.00	
93242-000	Carmen	United States	18,791.60	0.00	
93386-000	Yvonne Agudelo	United States	1,425.00	0.00	
93514-000	Carmen Garcia Rosario	United States	18,791.60	0.00	
93651-000	Lucia M Nova	United States	16,500.00	0.00	
94625-000	Raimundo Barreto	United States	10,024.90	0.00	
95543-000	Jose Maria Jorge	United States	106,518.00	0.00	
95619-000	Vania Figueiredo	United States	50,204.50	0.00	
95735-000	Marlos Andreucy Vasselai	United States	31,200.00	0.00	
95826-000	Neide Aparecida Lopes	United States	1,970.30	0.00	
96017-000	Silvia Eunice Reyes	United States	1,524.80	0.00	
96271-000	Carmen Yurbanía Crespo	United States	15,675.00	0.00	
96361-000	Maria Lucia Desouza	United States	43,527.89	0.00	
96371-000	Veronica Guadalupe Rodriguez	United States	5,100.00	0.00	
96607-000	Mirian V Pineda	United States	5,700.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
96714-000	Isaac Mainetti	United States	1,425.00	0.00	
96793-000	Marie Renee Joseph	United States	4,000.00	0.00	
97637-000	Alvaro Pedro	United States	45,611.40	0.00	
98272-000	Farina Pereira	United States	14,499.50	0.00	7
98322-000	Fabiano N Pereira	United States	21,524.70	0.00	8
98512-000	Wilck Venancio	United States	24,225.00	0.00	
98558-000	Juan Lau Tam Ore	United States	6,270.80	0.00	
98560-000	Carlos Armando Perez	United States	685.07	0.00	
100122-000	Emerson Conrado Ferraz	United States	11,400.00	0.00	
101284-000	Melvin Eduardo Erazo	United States	15,675.00	0.00	
101599-000	Gabriel Gerhske	United States	4,324.90	0.00	
101677-000	Barbara S Rocha Venturoso	United States	4,614.00	0.00	
102070-000	Luiz Lopes Da Silva Junior	United States	1,474.90	0.00	
102120-000	Ibrahim Abuhasan	United States	3,851.80	0.00	
102318-000	Younes Dif	United States	4,614.60	0.00	
102383-000	Gerlandia Batista Da Silva	United States	1,474.90	0.00	
102452-000	Younes Dif	United States	1,425.00	0.00	
102559-000	Daniel Roca	United States	14,299.90	0.00	
102713-000	Tesera Beatriz Chavez	United States	5,699.19	0.00	
102775-000	Gaida Abuwardeh	United States	49,625.50	0.00	
102789-000	Inias Dorinvil	United States	4,341.40	0.00	
103071-000	Vladimir Abdala	United States	4,324.90	0.00	
103096-000	Vladimir Abdala	United States	1,425.00	0.00	
103236-000	Marc Raphael	United States	3,500.00	0.00	
103301-000	Marcia Reynoso	United States	1,175.50	0.00	
103456-000	Alessandro Oliveira	United States	2,515.80	0.00	
103501-000	Winie D Souza	United States	150.00	0.00	
103760-000	Viguez Odies	United States	339.60	0.00	
104115-000	Carmen Yurbania Familia	United States	18,791.60	0.00	
104381-000	Ruth Kadziyanike	United States	12,600.00	0.00	
104398-000	Carmen Yurbania Crespo Varga	United States	18,791.60	0.00	
104452-000	Katia Batista Alpio	United States	15,525.30	0.00	
104474-000	Victoria Lam	United States	5,700.00	0.00	
104646-000	Duyen Lam	United States	9,725.50	0.00	
104759-000	Victoria Lam	United States	9,725.50	0.00	
104864-000	Carmen Yurbania Crespo Vargas	United States	18,791.60	0.00	
104990-002	Silvia Diaz	United States	7,472.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
105013-000	Franky Rene	United States	4,188.00	0.00	
105014-000	Maria Ferreira	United States	8,137.80	0.00	
105047-000	Silvio Calais	United States	17,349.50	0.00	
105287-000	Selin Ciftci	United States	1,425.00	0.00	
105469-000	Vanessa Rampasio Goncalves	United States	17,017.00	0.00	
105863-000	William Lantigua	United States	16,245.00	0.00	
106083-000	Diego Fernando Canido	United States	5,355.22	0.00	
106193-000	Rushdi Bseiso	United States	31,350.00	0.00	
106239-000	Washington Paiva Neves	United States	4,877.28	0.00	
106284-000	William M Lantigua	United States	16,245.00	0.00	
106478-000	Ruba Bseiso	United States	37,050.00	0.00	
106650-000	Jihad Missaoui	United States	19,725.10	0.00	
106825-000	Veronica Guadalupe Rodriguez	United States	5,749.90	0.00	
107031-000	Walfri Rodriguez	United States	7,075.10	0.00	
107163-000	Wesley Amaro Teixeira	United States	22,522.00	0.00	
107430-000	Xiu Liang	United States	35,965.80	0.00	
107667-000	Xiu Ping Liang	United States	36,873.20	0.00	
108085-000	Cesar Antonio Abreu	United States	27,075.00	0.00	
108505-000	Soem Soram Phoum	United States	8,194.00	0.00	
108539-000	Maria Josefina Cruz	United States	7,000.00	0.00	
108630-000	Domingos Rosa Da Silva	United States	4,324.90	0.00	
108698-000	Christine Moore	United States	9,975.00	0.00	
108709-000	glendalys pena	United States	1,425.00	0.00	9
108728-000	GLENDALYS PENA	United States	1,425.00	0.00	10
108746-000	GLENDALYS PENA	United States	1,425.00	0.00	11
108773-000	GLENDALYS PENA	United States	1,425.00	0.00	12
108783-000	Domingos Dasilva	United States	2,899.90	0.00	
108792-000	GLENDALYS PENA	United States	1,425.00	0.00	13
108809-000	GLENDALYS PENA	United States	1,425.00	0.00	14
108827-000	glendalys pena	United States	1,425.00	0.00	15
108853-000	glendalys pena	United States	1,425.00	0.00	16
108855-000	glendalys pena	United States	1,425.00	0.00	17
108915-000	glendalys pena	United States	1,425.00	0.00	18
109006-000	Fernelis	United States	4,275.00	0.00	
109081-000	Christopher Ginilheu Coimbra	United States	31,400.00	0.00	
109175-000	Jian Liang	United States	29,088.20	0.00	
109244-001	Nagmar Noide De Assis	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
109457-000	Jonathan D Nunez	United States	1,425.00	0.00	
109523-000	Geralda Francisca Antonio	United States	8,599.90	0.00	
109849-000	Seng Phearom	United States	10,018.50	0.00	
109916-000	Ezequiel Gino De Souza	United States	66,619.40	0.00	
110366-000	Shirley Novaes Silva	United States	25,000.00	0.00	
110434-000	Lorgio Antelo Ferrier	United States	10,074.80	0.00	
110491-000	Edson Junio Silva	United States	107,713.90	0.00	
110515-000	Gloriana Dejesus	United States	4,324.90	0.00	
110556-001	Victor Nascimento	United States	5,700.00	0.00	19
110590-000	Edna Anjos Doucette	United States	8,000.00	0.00	
110680-000	Bryan Omar Martinez	United States	13,000.00	0.00	
111194-000	Gray Cordero	United States	1,425.00	0.00	20
111212-000	Gray Cordero	United States	1,425.00	0.00	21
111233-000	Gray Cordero	United States	1,425.00	0.00	22
111261-000	Gray Cordero	United States	1,425.00	0.00	23
111288-000	Gray Cordero	United States	1,425.00	0.00	24
111357-002	Vinicius Munich	United States	36,330.30	0.00	
111488-000	Gray Cordero	United States	1,425.00	0.00	25
111541-000	Maria Do Carmo Murdock	United States	18,259.31	0.00	
111660-000	Gray Cordero	United States	7,125.00	0.00	26
111707-000	Ernesto Menjivar Santeliz	United States	7,963.90	0.00	
111718-000	Renato Magalhaes De Sousa	United States	11.20	0.00	
111970-000	Juan Miguel Dejesus	United States	1,425.00	0.00	
112005-000	Daylson Gomes Deoliveira	United States	2,899.90	0.00	
112026-000	Juan Dejesus	United States	1,425.00	0.00	
112221-000	Lilia Esperanza Ruiz	United States	7,500.00	0.00	
112230-000	Irma Julieta Rodriguez Lopez	United States	5,062.10	0.00	
112246-000	Domingo Javier	United States	1,135.30	0.00	
112392-000	Miky Santiago Gonzales	United States	15,000.00	0.00	
112434-000	Jje Enterprise Corp	United States	10,000.00	0.00	
112506-000	Luis A Morales	United States	113,431.90	0.00	
112531-000	Barbara	United States	339.60	0.00	
112821-000	Carlos Lizardo	United States	3,966.80	0.00	
112865-000	Luis Antonio Morales	United States	113,431.90	0.00	
113073-000	William Clayton De Camargo	United States	24,225.00	0.00	
113446-000	Daniela Catricala	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
114211-000	Miltes Aparecida Barbosa Rabelo Aparecida Barbosa	United States	13,629.90	0.00	
114322-000	Daniel M Sosa	United States	18,537.12	0.00	
114516-000	Ferdinand Polahon Chilagan	United States	3,500.00	0.00	
115036-000	Wellington Leonidas Gonzalez	United States	2,424.99	0.00	
115155-000	Efrian Martinez	United States	8,550.00	0.00	
115190-000	Virgen Gonzalez	United States	3,484.73	0.00	
115272-000	Guadalupe Pineda	United States	31,948.80	0.00	
115315-000	Fabiana Aguar	United States	44,378.60	0.00	
115640-000	Ruthshel Nathanaelle Telus	United States	5,000.00	0.00	
115693-000	Karina Lopez	United States	7,000.00	0.00	
116751-000	Dioselin Jacome	United States	4,275.00	0.00	
116759-000	Andres Gonzalo Cedillo	United States	2,850.00	0.00	
117146-000	Rodrigo T Souza	United States	2,850.00	0.00	
117167-000	Jose Echeverria	United States	31,050.60	0.00	
117177-000	Dario Echeverria	United States	4,324.90	0.00	
117188-000	Hernani Pereira Jorge	United States	52,197.80	0.00	
117263-000	Vilma Isabel Posada	United States	11,449.90	0.00	
117298-000	Densy Fradil Rosa Lora	United States	16,400.00	0.00	
117428-000	Pedro Rodriguez	United States	30,825.70	0.00	
117784-000	Sergio Pereira De Souza	United States	19,452.60	0.00	
117806-000	Cederne Bossuet	United States	2,655.20	0.00	
118144-000	Musa Abuhasan	United States	71,074.20	0.00	
118300-000	Mario A Zavala	United States	13,137.90	0.00	
118348-000	Nuno Miguel Ramos Lopes E Castro	United States	12,389.00	0.00	
118352-000	Rocstilllo	United States	5,550.30	0.00	
118398-000	Aparecida Ferreira Campos	United States	3,636.30	0.00	
118404-000	Dalila Nascimento	United States	8,870.10	0.00	
119282-000	Wilson Michael Solares	United States	3,238.90	0.00	
119362-000	Doris Pujols	United States	190.20	0.00	

Notes

1: Country of Residence as entered by Claimant on the claim form filed electronically.

2: Claimant Name was identified as "Telexfree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Where Notices Should be Sent" field on the claim form filed electronically.

3: Claimant Name was identified as "Telefree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.

[illegible]

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
22:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
23:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
24:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
25:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
26:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				

Exhibit C

**TRIBUNAL DE FALÊNCIA DOS ESTADOS UNIDOS
DISTRITO DO MASSACHUSETTS**

Assunto:	)	
	)	
	)	Processo de falência “Chapter 11”
	)	
TELEXFREE, LLC,	)	Processo No. 14-40987-MSH
TELEXFREE, INC.,	)	Processo No. 14-40988-MSH
TELEXFREE FINANCIAL, INC.,	)	Processo No. 14-40989-MSH
	)	
Devedores.	)	Administrados em conjunto
	)	

SEXAGÉSIMA OITAVA NOTIFICAÇÃO DE RECUSA DE REIVINDICAÇÃO

De acordo com a ordem (“Ordem”) de 26 de dezembro de 2017 aprovando a *Petição pelo Administrador de Falência para Estabelecer Procedimentos Coletivos para a Resolução de Reivindicações Contestadas de Participantes*, Stephen B. Darr, o administrador de falência devidamente designado (o “Administrador”) do patrimônio de falência da TelexFree, LLC, TelexFree, Inc. e TelexFree Financial, Inc. (coletivamente, os “Devedores” ou “TelexFree”), enviou as Notificações de Proposta de Resolução de Reivindicação aos Participantes relacionados no Anexo “A” (os “Participantes do Anexo A”). Os Participantes listados no Anexo A não protocolaram suas Respostas às Notificações de Proposta de Resolução de Reivindicação no prazo de trinta (30) dias, conforme exigido pelos termos da Ordem.

As reivindicações dos Participantes do Anexo A serão indeferidas sem ordem ou notificação adicional, a menos que, no prazo de vinte e um (21) dias a partir da presente data, o Participante do Anexo A protocole junto ao Tribunal e envie ao Administrador uma Resposta de Reivindicação contestando o valor proposto autorizado e justificando por boa causa a falha em responder tempestivamente à Notificação de Proposta de Resolução de Reivindicação.

À sua apreciação, respeitosamente,
STEPHEN B. DARR,
ADMINISTRADOR DE FALÊNCIA
Através de seu advogado,

/s/ Andrew G. Lizotte
Andrew G. Lizotte (BBO #559609)
MURPHY & KING, P.C.
One Beacon Street
Boston, MA 02108-3107
Telefone: (617) 423-0400
ALizotte@murphyking.com

Datado: 26 de novembro de 2018
749717

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
65968-000	Ricardo Cruz	United States	\$ 15,500.00	\$ 0.00	
65972-000	Canland Enterprises	United States	14,250.00	0.00	
66008-000	Jose M Chavez	United States	20,000.00	0.00	
66015-000	Denis Anibal Herrera	United States	8,500.00	0.00	
66017-000	Lorena Fernandes	United States	4,225.10	0.00	
66022-000	Vilma Z Alfaro	United States	1,425.00	0.00	
66175-000	Ivania Rodriguez	United States	4,325.00	0.00	2
66761-000	Jaime Ochoa	United States	3,244.90	0.00	
66876-000	Edivaldo Alves Reis	United States	345,000.00	0.00	
67510-000	Nathalie Botbol	United States	1,425.00	0.00	
68134-000	Kennedy Ndamba	United States	3,211.39	0.00	
68522-000	Magalie Simon	United States	3,950.70	0.00	
68905-000	Sovann Chhong	United States	4,682.30	0.00	
69411-000	Carol Njeri Ngunjiri	United States	2,899.90	0.00	
69979-000	So Rathkarin	United States	667.90	0.00	
70084-000	Martin Ventura	United States	20,700.00	0.00	
70164-001	Emmanuel Chikwendu	United States	6,207.13	0.00	
70217-000	Izabella Diniz Fagundes	United States	9,925.10	0.00	
70297-000	Tianny Marmolejos	United States	10,002.80	0.00	
70996-000	Carlos Santos	United States	14,471.51	0.00	
71032-001	George Paretsis	United States	1,474.90	0.00	
71050-000	Karna B Biswa	United States	986.00	0.00	
71051-000	Gustavo Da Silva	United States	2,750.20	0.00	
71108-000	Morena Hossabeth Olivares	United States	5,000.00	0.00	
71153-000	Lubien Alabre	United States	50,000.00	0.00	
71170-000	Javier Hernandez	United States	679.20	0.00	
71187-000	Ruddy Ortiz	United States	8,550.00	0.00	3
71745-000	Alanna Massotti	United States	9,675.60	0.00	
71857-000	Maude Duvivier	United States	340.50	0.00	
72103-000	Farouk Khoury	United States	10,134.23	0.00	
72838-000	Denis E Rubio	United States	28,990.00	0.00	4
73435-000	Jose N Contreras	United States	2,073.70	0.00	5
73706-000	Gilbert Winner	United States	339.00	0.00	
73899-000	Thiago Silva De Souza	United States	4,869.80	0.00	
74539-000	Lucner Charlestra	United States	19,576.20	0.00	
74541-000	Penelope Cornelio	United States	8,000.00	0.00	
74545-000	Mercia Francisca S Rocha	United States	3,344.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
75729-000	Monique Halabi	United States	5,900.00	0.00	
75772-000	Camille Francis	United States	15,000.00	0.00	
75850-000	Michael Ricardo Castro	United States	1,474.90	0.00	
76143-000	Nelson Almada	United States	22,850.00	0.00	
76261-000	Samuel Augusto Saillant	United States	26,176.80	0.00	
76303-000	Claudemir E Sathler	United States	14,250.00	0.00	
76474-000	Ricardo Grossi Pereira	United States	8,864.50	0.00	
76752-000	Jose Belliard	United States	2,800.10	0.00	
76796-000	Leonidas Campos	United States	27,662.96	0.00	
77240-000	Mercedes Acevedo	United States	2,800.10	0.00	
77280-000	Daniel Acevedo	United States	2,850.00	0.00	
77430-000	Rhadassa Zorzal Nicoli	United States	69,707.08	0.00	
77779-000	Ulisses Jose S Rocha	United States	6,194.00	0.00	
78464-000	Ruth Kosta Dhionis	United States	7,065.09	0.00	
78631-000	Leandro G Ferreira	United States	4,358.26	0.00	
79045-000	Ronel Alexis	United States	5,010.10	0.00	
79830-000	Cely Ramos Downing	United States	4,422.00	0.00	
79843-000	Leida Osorio	United States	199.60	0.00	
79924-000	Serxhana Kajtazi	United States	5,755.00	0.00	
80408-000	Vioval Investments C-O Bertilio S Rendon	United States	13,116.90	0.00	
80620-000	Jean Pierre	United States	7,121.00	0.00	
80855-000	Rock Enterprises Corp	United States	11,369.60	0.00	
80929-000	Elias Benito Ramirez	United States	7,500.00	0.00	
81482-000	Lucio Jose Mascena	United States	343,583.80	0.00	
82522-000	Ana Lee Espinal	United States	8,400.00	0.00	
83163-000	Milton De Assis Oliveira	United States	3,078.00	0.00	
83175-000	Aida Luz Arroyo	United States	3,000.00	0.00	
83914-000	Daniel Viana	United States	1,474.90	0.00	
84318-000	Barbara Lauture	United States	339.60	0.00	6
86961-000	Lucas Gomes Brito	United States	27,391.64	0.00	
87140-000	Jose Gamba	United States	5,700.00	0.00	
87642-000	Angel Medina	United States	10,430.00	0.00	
87673-000	Samuel Perez	United States	3,000.00	0.00	
87777-000	Marcho Bazile	United States	5,376.90	0.00	
87803-000	Samantha Marie Nunes	United States	7,000.00	0.00	
88505-000	Gilliard Barbosa	United States	4,275.00	0.00	
88543-000	Brasilmar Santos	United States	12,388.30	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
88579-000	Romina N Montesinos	United States	21,724.30	0.00	
88595-000	Lazaro Antonio Lucas Jr	United States	5,113.60	0.00	
88662-000	Brasimar Santos	United States	12,388.30	0.00	
88937-000	Bruno Ribeiro	United States	2,750.20	0.00	
88952-000	Alceu Venturoso	United States	4,943.80	0.00	
89115-000	Hector Antonio Francisco	United States	6,536.50	0.00	
89156-000	Jesus Antonio Francisco	United States	4,245.20	0.00	
90147-000	Eugenia Panameno	United States	2,850.00	0.00	
90472-000	Rosa Mayra Ortiz	United States	15,000.00	0.00	
90508-000	Wilmer Vicente	United States	9,000.00	0.00	
90537-000	Samuel Vicente Aguirre Vicente Aguirre	United States	15,000.00	0.00	
90546-000	Ivelisse Amador	United States	7,600.00	0.00	
90671-000	Reynold Philemon	United States	9,042.30	0.00	
91064-000	Mayra Patricia Socop Raymundo	United States	670.00	0.00	
91804-000	Alessandro Araujo	United States	4,345.00	0.00	
92147-000	Joao Manuel Teixeira	United States	3,000.00	0.00	
92169-000	Hector Antonio Francisco	United States	1,266.00	0.00	
92189-000	Teosvaldo Alberto Pepin	United States	11,400.00	0.00	
92252-000	Margarete Casita Moura	United States	7,000.00	0.00	
92383-000	Mario R Henriquez	United States	13,137.90	0.00	
92623-000	Douglas Jr Furrier	United States	12,288.50	0.00	
92715-000	Douglas Furrier	United States	12,288.50	0.00	
92883-000	Carmen Yurbania Crespo	United States	99.80	0.00	
93242-000	Carmen	United States	18,791.60	0.00	
93386-000	Yvonne Agudelo	United States	1,425.00	0.00	
93514-000	Carmen Garcia Rosario	United States	18,791.60	0.00	
93651-000	Lucia M Nova	United States	16,500.00	0.00	
94625-000	Raimundo Barreto	United States	10,024.90	0.00	
95543-000	Jose Maria Jorge	United States	106,518.00	0.00	
95619-000	Vania Figueiredo	United States	50,204.50	0.00	
95735-000	Marlos Andreucy Vasselai	United States	31,200.00	0.00	
95826-000	Neide Aparecida Lopes	United States	1,970.30	0.00	
96017-000	Silvia Eunice Reyes	United States	1,524.80	0.00	
96271-000	Carmen Yurbania Crespo	United States	15,675.00	0.00	
96361-000	Maria Lucia Desouza	United States	43,527.89	0.00	
96371-000	Veronica Guadalupe Rodriguez	United States	5,100.00	0.00	
96607-000	Mirian V Pineda	United States	5,700.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
96714-000	Isaac Mainetti	United States	1,425.00	0.00	
96793-000	Marie Renee Joseph	United States	4,000.00	0.00	
97637-000	Alvaro Pedro	United States	45,611.40	0.00	
98272-000	Farina Pereira	United States	14,499.50	0.00	7
98322-000	Fabiano N Pereira	United States	21,524.70	0.00	8
98512-000	Wilck Venancio	United States	24,225.00	0.00	
98558-000	Juan Lau Tam Ore	United States	6,270.80	0.00	
98560-000	Carlos Armando Perez	United States	685.07	0.00	
100122-000	Emerson Conrado Ferraz	United States	11,400.00	0.00	
101284-000	Melvin Eduardo Erazo	United States	15,675.00	0.00	
101599-000	Gabriel Gerhske	United States	4,324.90	0.00	
101677-000	Barbara S Rocha Venturoso	United States	4,614.00	0.00	
102070-000	Luiz Lopes Da Silva Junior	United States	1,474.90	0.00	
102120-000	Ibrahim Abuhasan	United States	3,851.80	0.00	
102318-000	Younes Dif	United States	4,614.60	0.00	
102383-000	Gerlandia Batista Da Silva	United States	1,474.90	0.00	
102452-000	Younes Dif	United States	1,425.00	0.00	
102559-000	Daniel Roca	United States	14,299.90	0.00	
102713-000	Tesera Beatriz Chavez	United States	5,699.19	0.00	
102775-000	Gaida Abuwardeh	United States	49,625.50	0.00	
102789-000	Inias Dorinvil	United States	4,341.40	0.00	
103071-000	Vladimir Abdala	United States	4,324.90	0.00	
103096-000	Vladimir Abdala	United States	1,425.00	0.00	
103236-000	Marc Raphael	United States	3,500.00	0.00	
103301-000	Marcia Reynoso	United States	1,175.50	0.00	
103456-000	Alessandro Oliveira	United States	2,515.80	0.00	
103501-000	Winie D Souza	United States	150.00	0.00	
103760-000	Viguez Odies	United States	339.60	0.00	
104115-000	Carmen Yurbania Familia	United States	18,791.60	0.00	
104381-000	Ruth Kadziyanike	United States	12,600.00	0.00	
104398-000	Carmen Yurbania Crespo Varga	United States	18,791.60	0.00	
104452-000	Katia Batista Alpio	United States	15,525.30	0.00	
104474-000	Victoria Lam	United States	5,700.00	0.00	
104646-000	Duyen Lam	United States	9,725.50	0.00	
104759-000	Victoria Lam	United States	9,725.50	0.00	
104864-000	Carmen Yurbania Crespo Vargas	United States	18,791.60	0.00	
104990-002	Silvia Diaz	United States	7,472.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
105013-000	Franky Rene	United States	4,188.00	0.00	
105014-000	Maria Ferreira	United States	8,137.80	0.00	
105047-000	Silvio Calais	United States	17,349.50	0.00	
105287-000	Selin Ciftci	United States	1,425.00	0.00	
105469-000	Vanessa Rampasio Goncalves	United States	17,017.00	0.00	
105863-000	William Lantigua	United States	16,245.00	0.00	
106083-000	Diego Fernando Canido	United States	5,355.22	0.00	
106193-000	Rushdi Bseiso	United States	31,350.00	0.00	
106239-000	Washington Paiva Neves	United States	4,877.28	0.00	
106284-000	William M Lantigua	United States	16,245.00	0.00	
106478-000	Ruba Bseiso	United States	37,050.00	0.00	
106650-000	Jihad Missaoui	United States	19,725.10	0.00	
106825-000	Veronica Guadalupe Rodriguez	United States	5,749.90	0.00	
107031-000	Walfri Rodriguez	United States	7,075.10	0.00	
107163-000	Wesley Amaro Teixeira	United States	22,522.00	0.00	
107430-000	Xiu Liang	United States	35,965.80	0.00	
107667-000	Xiu Ping Liang	United States	36,873.20	0.00	
108085-000	Cesar Antonio Abreu	United States	27,075.00	0.00	
108505-000	Soem Soram Phoum	United States	8,194.00	0.00	
108539-000	Maria Josefina Cruz	United States	7,000.00	0.00	
108630-000	Domingos Rosa Da Silva	United States	4,324.90	0.00	
108698-000	Christine Moore	United States	9,975.00	0.00	
108709-000	glendalys pena	United States	1,425.00	0.00	9
108728-000	GLENDALYS PENA	United States	1,425.00	0.00	10
108746-000	GLENDALYS PENA	United States	1,425.00	0.00	11
108773-000	GLENDALYS PENA	United States	1,425.00	0.00	12
108783-000	Domingos Dasilva	United States	2,899.90	0.00	
108792-000	GLENDALYS PENA	United States	1,425.00	0.00	13
108809-000	GLENDALYS PENA	United States	1,425.00	0.00	14
108827-000	glendalys pena	United States	1,425.00	0.00	15
108853-000	glendalys pena	United States	1,425.00	0.00	16
108855-000	glendalys pena	United States	1,425.00	0.00	17
108915-000	glendalys pena	United States	1,425.00	0.00	18
109006-000	Fernelis	United States	4,275.00	0.00	
109081-000	Christopher Ginilheu Coimbra	United States	31,400.00	0.00	
109175-000	Jian Liang	United States	29,088.20	0.00	
109244-001	Nagmar Noide De Assis	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
109457-000	Jonathan D Nunez	United States	1,425.00	0.00	
109523-000	Geralda Francisca Antonio	United States	8,599.90	0.00	
109849-000	Seng Phearom	United States	10,018.50	0.00	
109916-000	Ezequiel Gino De Souza	United States	66,619.40	0.00	
110366-000	Shirley Novaes Silva	United States	25,000.00	0.00	
110434-000	Lorgio Antelo Ferrier	United States	10,074.80	0.00	
110491-000	Edson Junio Silva	United States	107,713.90	0.00	
110515-000	Gloriana Dejesus	United States	4,324.90	0.00	
110556-001	Victor Nascimento	United States	5,700.00	0.00	19
110590-000	Edna Anjos Doucette	United States	8,000.00	0.00	
110680-000	Bryan Omar Martinez	United States	13,000.00	0.00	
111194-000	Gray Cordero	United States	1,425.00	0.00	20
111212-000	Gray Cordero	United States	1,425.00	0.00	21
111233-000	Gray Cordero	United States	1,425.00	0.00	22
111261-000	Gray Cordero	United States	1,425.00	0.00	23
111288-000	Gray Cordero	United States	1,425.00	0.00	24
111357-002	Vinicius Munich	United States	36,330.30	0.00	
111488-000	Gray Cordero	United States	1,425.00	0.00	25
111541-000	Maria Do Carmo Murdock	United States	18,259.31	0.00	
111660-000	Gray Cordero	United States	7,125.00	0.00	26
111707-000	Ernesto Menjivar Santeliz	United States	7,963.90	0.00	
111718-000	Renato Magalhaes De Sousa	United States	11.20	0.00	
111970-000	Juan Miguel Dejesus	United States	1,425.00	0.00	
112005-000	Daylson Gomes Deoliveira	United States	2,899.90	0.00	
112026-000	Juan Dejesus	United States	1,425.00	0.00	
112221-000	Lilia Esperanza Ruiz	United States	7,500.00	0.00	
112230-000	Irma Julieta Rodriguez Lopez	United States	5,062.10	0.00	
112246-000	Domingo Javier	United States	1,135.30	0.00	
112392-000	Miky Santiago Gonzales	United States	15,000.00	0.00	
112434-000	Jje Enterprise Corp	United States	10,000.00	0.00	
112506-000	Luis A Morales	United States	113,431.90	0.00	
112531-000	Barbara	United States	339.60	0.00	
112821-000	Carlos Lizardo	United States	3,966.80	0.00	
112865-000	Luis Antonio Morales	United States	113,431.90	0.00	
113073-000	William Clayton De Camargo	United States	24,225.00	0.00	
113446-000	Daniela Catricala	United States	4,275.00	0.00	

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
114211-000	Miltes Aparecida Barbosa Rabelo Aparecida Barbosa	United States	13,629.90	0.00	
114322-000	Daniel M Sosa	United States	18,537.12	0.00	
114516-000	Ferdinand Polahon Chilagan	United States	3,500.00	0.00	
115036-000	Wellington Leonidas Gonzalez	United States	2,424.99	0.00	
115155-000	Efrian Martinez	United States	8,550.00	0.00	
115190-000	Virgen Gonzalez	United States	3,484.73	0.00	
115272-000	Guadalupe Pineda	United States	31,948.80	0.00	
115315-000	Fabiana Aguar	United States	44,378.60	0.00	
115640-000	Ruthshel Nathanaelle Telus	United States	5,000.00	0.00	
115693-000	Karina Lopez	United States	7,000.00	0.00	
116751-000	Dioselin Jacome	United States	4,275.00	0.00	
116759-000	Andres Gonzalo Cedillo	United States	2,850.00	0.00	
117146-000	Rodrigo T Souza	United States	2,850.00	0.00	
117167-000	Jose Echeverria	United States	31,050.60	0.00	
117177-000	Dario Echeverria	United States	4,324.90	0.00	
117188-000	Hernani Pereira Jorge	United States	52,197.80	0.00	
117263-000	Vilma Isabel Posada	United States	11,449.90	0.00	
117298-000	Densy Fradil Rosa Lora	United States	16,400.00	0.00	
117428-000	Pedro Rodriguez	United States	30,825.70	0.00	
117784-000	Sergio Pereira De Souza	United States	19,452.60	0.00	
117806-000	Cederne Bossuet	United States	2,655.20	0.00	
118144-000	Musa Abuhasan	United States	71,074.20	0.00	
118300-000	Mario A Zavala	United States	13,137.90	0.00	
118348-000	Nuno Miguel Ramos Lopes E Castro	United States	12,389.00	0.00	
118352-000	Rocstilllo	United States	5,550.30	0.00	
118398-000	Aparecida Ferreira Campos	United States	3,636.30	0.00	
118404-000	Dalila Nascimento	United States	8,870.10	0.00	
119282-000	Wilson Michael Solares	United States	3,238.90	0.00	
119362-000	Doris Pujols	United States	190.20	0.00	

Notes

1: Country of Residence as entered by Claimant on the claim form filed electronically.

2: Claimant Name was identified as "Telexfree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Where Notices Should be Sent" field on the claim form filed electronically.

3: Claimant Name was identified as "Telefree" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.

[illegible]

Claim Number	Claimant Name	Country of Residence ¹	Amount of Claim as Filed	Proposed Allowed Amount	Notes
22:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
23:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
24:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
25:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				
26:	Claimant Name was identified as "telex free" on the claim form filed electronically. As this information appeared to be incomplete or inaccurate, Claimant Name in table above was entered based upon information provided in the "Signature" field on the claim form filed electronically.				

**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

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on this day I caused to be served a copy of the following document via operation of this Court's CM/ECF System, by Electronic Mail, and by First Class Mail, postage prepaid as indicated to the attached service list:

- *Opposition by Liquidating Trustee to Expedited Motion for Request to Reinstate Proof of Claim Filed by Edivaldo Alves Reis and time to File Supporting Documents*

/s/ Andrew G. Lizotte
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Dated: August 6, 2020
783784

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