

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

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

Debtors.

Chapter 11 Cases

14-40987-EDK
14-40988-EDK
14-40989-EDK

Jointly Administered

STEPHEN DARR, AS HE IS THE TRUSTEE OF
THE CHAPTER 11 ESTATES OF EACH OF THE
DEBTORS,

Plaintiff,

v.

CRAFT FINANCIAL SOLUTIONS, LLC; CRAFT
TRUST FINANCIAL, LLC, a/k/a CRAFT TRUST
SERVICES, LLC; and JOSEPH CRAFT,

Defendants.

Adversary Proceeding
No. 16-04035

MOTION TO WITHDRAW

Jonathan C. Crafts, as attorney for Craft Financial Solutions, LLC, Craft Trust Financial, LLC, a/k/a Craft Trust Financial, LLC, and Joseph Craft (collectively “**Craft Defendants**”), hereby moves to withdraw his appearance and substitute Christopher M. Hynes, Esq., of Dwyer LLC as attorney for the Craft Defendants. Additionally, Attorney Crafts respectfully requests removal from all mailing and electronic service lists in this case. Plaintiff, the Trustee of the Chapter 11 Estates of Each of the Debtors, has no objection to this Motion. In support of this Motion, Attorney Crafts states as follows:

1. Plaintiff opened this adversary matter on April 5, 2016;



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2. On July 12, 2017, Plaintiff filed a Stipulation of Settlement and Motion to Approve the Stipulation of Settlement with the Craft Defendants;
3. This court entered an Order, dated August 9, 2017, approving the Stipulation of Settlement with the Craft Defendants;
4. Attorney Crafts no longer works at Dwyer LLC, and so no longer represents the Craft Defendants;
5. Attorney Christopher M. Hynes of Dwyer LLC, BBO# 706665, represents the Craft Defendants, and has entered his appearance on their behalf, see Docket No. 31 & 32;
6. No party will be harmed by allowing Jonathan C. Crafts to withdraw; and
7. Plaintiff has no objection to the withdrawal of Jonathan C. Crafts.

WHEREFORE, Attorney Crafts prays that this Court: (1) allow Jonathan C. Crafts to withdraw from representation of the Craft Defendants; (2) substitute Christopher M. Hynes as counsel for the Craft Defendants; (3) remove Attorney Crafts from all mailing and electronic service lists in this case; and (4) grant such other relief as is just and proper.

Respectfully submitted,

/s/ Jonathan C. Crafts
Jonathan C. Crafts (BBO# 677887)
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Dated: April 5, 2022

CERTIFICATE OF SERVICE

I hereby certify that, on April 5, 2022, the foregoing document was filed with the United States Bankruptcy Court, District of Massachusetts, and served on all parties entitled to receive notice of filings in the above-captioned case via the Bankruptcy Court's Electronic Case Filing (ECF) system.

By: /s/ Jonathan C. Crafts
Jonathan C. Crafts