

4. The Plan provides for distribution to participants who purchased TelexFree VoIP or membership plans (“Participants”) and who hold allowed claims. Class 2 Convenience Participants consist of all Participants who hold allowed claims in the amount of \$4,250 or less. Class 3 consists of all other Participants holding allowed claims.

5. The Liquidating Trustee requires certain information from Participants in order to facilitate a distribution including:

- (i) identification of a method of payment;
- (ii) in the case of a Class 2 Convenience Participant holding an allowed claim of \$4,250 or less, whether such claimant elects to be treated as a Class 3 Participant; and
- (iii) in the case of a foreign Participant, certification of compliance with the Office of Foreign Asset Control, (collectively, the “Payment Information”).

6. Pursuant to the terms of the Plan Order, Participants had until January 13, 2021 to complete and return the Payment Information to the Liquidating Trustee and, absent such compliance, Participants would be barred from receiving a distribution. See Plan Order, ¶¶35-37.

7. Shortly after the Plan Order entered, the Liquidating Trustee sent Participants holding allowed or unresolved claims an *Important Notice Regarding Payment Information*, which provided Participants with an opportunity to access the website **payment.telexfreeclaims.com** and complete the required Payment Information.

8. There are approximately 100,000 allowed claims. By the end of January 2021, the Liquidating Trustee projects that he will have distributed approximately \$102,000,000 to approximately 67,000 holders of allowed Participant claims.

9. There remain approximately 33,000 holders of allowed claims who have not yet completed their Payment Information. Since the entry of the Plan Order, the Liquidating Trustee, either directly or through his distribution agent BMC Group, has sent at least five electronic notices to holders of allowed claims respecting the need to provide Payment Information, as well as two regular mailings to those Participants whose electronic mail messages were not delivered. In December 2020, the Liquidating Trustee updated the website **payment.telexfreeclaims.com** to provide further assistance and information to holders of allowed claims. The Liquidating Trustee and his agents have been responding to Participant inquiries on a continual basis, and the updated website provides an opportunity to submit a “ticket” for further assistance.

Requested Relief

10. By this motion, the Liquidating Trustee seeks to extend the deadline for Participants to complete their Payment Information through March 31, 2021. The Liquidating Trustee considers the extension appropriate given the number of Participants affected, their geographical location, language barriers and relative lack of business sophistication.

11. Upon entry of order attached as Exhibit “A” hereto, the Trustee proposes to send to the holders of allowed Participant claims who have not yet completed their Payment Information a copy of the notice attached as Exhibit “B” hereto, either electronically or, in the absence of a deliverable electronic address, by regular mail. The Liquidating Trustee and his agents continue to receive messages and requests for information from Participants regarding the

status of their claims and distributions and will continue to work with Participants to facilitate the distributions authorized by the Plan.

WHEREFORE, the Liquidating Trustee prays that the Court:

1. Enter an order in the form attached as Exhibit "A" extending the time through March 31, 2021 for Participants holding allowed claims to complete the Payment Information in accordance with the terms of the Plan Order;
2. Authorize the Liquidating Trustee to deliver to Participants by electronic mail (or by regular mail in the absence of a deliverable email address) a notice substantially in the form attached as Exhibit "B" hereto (in English, Spanish and Portuguese); and
3. 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)
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Telephone: (617) 423-0400
Email: alizotte@murphyking.com

Dated: January 12, 2021
790863

**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
)	
Reorganized Debtors.)	Substantively Consolidated

**ORDER APPROVING MOTION BY LIQUIDATING TRUSTEE TO EXTEND TIME
FOR HOLDERS OF ALLOWED PARTICIPANT CLAIMS
TO SUBMIT PAYMENT INFORMATION**

A motion having been filed by Stephen B. Darr, the Liquidating Trustee (the “Trustee”) of the bankruptcy estates (“Estates”) of TelexFree LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, “TelexFree”) to Extend the Time for Holders of Allowed Participant Claims to Submit Payment Information¹ (the “Motion”), all parties-in-interest being provided notice of the Motion and an opportunity to submit a response, and for good cause shown, the Court orders as follows with respect to the Motion:

1. The Motion is allowed.
2. The deadline for Participants holding allowed claims to submit Payment

Information to the Trustee in accordance with the terms of the Plan Order is hereby extended from January 13, 2021 to March 31, 2021.

3. The Liquidating Trustee shall deliver to those Participants whose claims are allowed or not yet resolved and who have not yet provided their Payment Information a notice substantially in the form attached as Exhibit “B” to the Motion.

¹ Terms not otherwise defined herein shall have the meaning set forth in the Motion.

4. The provisions of the Plan Order shall otherwise remain in full force and effect.

Dated: _____

Hon. Melvin S. Hoffman
United States Bankruptcy Judge

790890

(iii) You must certify compliance with the Office of Foreign Assets Control.

I. HOW DO I PROVIDE THE PAYMENT INFORMATION

You can provide the Payment Information by visiting <https://payment.telexfreeclaims.com> and completing the Request for Payment Information.

II. HOW LONG DO I HAVE TO COMPLETE THE PAYMENT INFORMATION

The deadline to complete the Payment Information has been extended from January 13, 2021 through March 31, 2021. You are encouraged to complete the Request for Payment Information as soon as possible because you will not receive a distribution unless it is completed.

III. WHAT HAPPENS IF I DO NOT COMPLETE THE PAYMENT INFORMATION

If you do not complete the Request for Payment Information by March 31, 2021, you will not be entitled to a distribution in these Chapter 11 Cases. You are required to provide the Payment Information regardless of whether your claim has been allowed.

IV. WHO IS ENTITLED TO GET A DISTRIBUTION

Only holders of Allowed Claims who complete the Request for Payment Information will be entitled to a distribution. **If your claim has not yet been Allowed, it must be Allowed in order for you to receive a distribution.** If you do not know the status or the amount of your Participant Claim, you can go to <https://payment.telexfreeclaims.com> for further information.

Stephen B. Darr, Chapter 11 Trustee
By his attorneys,

Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108

January ____, 2021
790891

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

<hr/>)	
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
)	
Reorganized Debtors.)	Substantively Consolidated
<hr/>)	

CERTIFICATE OF SERVICE

I, Andrew G. Lizotte, hereby certify that on January 12, 2021, I caused to be served, by this Court's CM/ECF system, and by electronic mail as indicated on the service list attached as Exhibit A, a copy of the following document:

- Motion by Liquidating Trustee to Extend Time for Holders of Allowed Participant Claims to Submit Payment Information

/s/ Andrew G. Lizotte

Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
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Dated: January 12, 2021
790918

**IN RE: TELEXFREE, LLC, TELEXFREE, INC., AND
TELEXFREE FINANCIAL, INC.
BANKRUPTCY NO. 14-40987**

EXHIBIT A TO

CERTIFICATE OF SERVICE

(Dated January 12, 2021)

Telexfree, LLC
Service List

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