

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**IN RE: TELEXFREE SECURITIES
LITIGATION**

MDL No. 4:14-md-2566-TSH

**This Document Relates to:
ALL CASES**

**MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH
DEFENDANTS JOSEPH CRAFT AND CRAFT FINANCIAL SOLUTIONS, INC.,
BASE COMMERCE, LLC, SYNOVUS BANK, AND CERTAIN RELATED PARTIES**

Plaintiffs Waldamara Martin, Igor Shikhman, Tyzza Hartman, Edivaldo A. Reis, and Rita Dos Santos (together “Class Representatives”) hereby move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for final approval of the settlements reached with Defendants Joseph Craft and Craft Financial Solutions, Inc. (the “Craft Defendants”) and related parties BWFC Processing Center, LLC, ACE LLP and Audra Craft (collectively with the Craft Defendants, the “Craft Parties”) and Defendants Base Commerce, LLC, Synovus Bank, John Hughes, Brian Bonfiglio, John Kirchhefer, and Alex Sidel (together the “Base/Synovus Defendants”). Plaintiffs seek entry of orders:

1. granting final approval of the settlement agreement with the Craft Parties (the “Craft Agreement”) and the settlement agreement with the Base/Synovus Defendants (the “Base/Synovus Agreement”) as fair, reasonable, and adequate;
2. certifying a settlement class with respect to each settlement;

3. approving the manner and form of notice given to the class members as the best notice practicable under the circumstances; and
4. entering final judgment as to the Craft Defendants and the Base/Synovus Defendants.

The grounds for this motion are that (1) the settlement agreements meet the requirements for approval pursuant to Federal Rule of Civil Procedure 23(e); (2) the form and manner of providing notice met the requirements of Federal Rule of Civil Procedure 23(c) and due process; (3) the settlement class meets the requirements for certification under Federal Rule of Civil Procedure 23; (4) the response of the class supports final approval; and (5) there is no just reason for delay in the entry of Final Judgment as to the Craft Defendants and the Base/Synovus Defendants.

This motion is based upon this Motion and the Memorandum of Law in support of Final Approval, the Declaration of Robert J. Bonsignore, and the Declaration of Eric Schachter filed concurrently herewith, the complete files and records of this action, and such other written or oral arguments that may be presented to the Court.

Dated: July 8, 2020

Respectfully submitted,
TELEXFREE CLASS PLAINTIFFS
By their attorneys,

/s/ Robert J. Bonsignore
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CERTIFICATE OF SERVICE

I, Robert J. Bonsignore, hereby certify that on this 8th day of July 2020, I caused the foregoing to be electronically filed with the Clerk of the Court by using the Case Management/Electronic Case Filing (CM/ECF) system, which will send a notice of electronic filing to all parties registered with the CM/ECF system in the above-captioned matter. A copy will be forwarded via first class mail, postage prepaid, to those parties not electronically registered at their last and/or only known address.

1. MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH DEFENDANTS JOSEPH CRAFT AND CRAFT FINANCIAL SOLUTIONS, INC., BASE COMMERCE, LLC, SYNOVUS BANK, AND CERTAIN RELATED PARTIES;
2. MEMORANDUM IN SUPPORT OF MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH DEFENDANTS BASE COMMERCE, LLC, SYNOVUS BANK, JOSEPH CRAFT, CRAFT FINANCIAL SOLUTIONS, INC., AND CERTAIN RELATED INDIVIDUALS
3. ATTACHMENT A: DECLARATION OF ERIC SCHACTER IN SUPPORT OF MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH DEFENDANTS JOSEPH CRAFT AND CRAFT FINANCIAL SOLUTIONS, INC., BASE COMMERCE, LLC, SYNOVUS BANK, AND CERTAIN RELATED PARTIES INCLUDING EXHIBITS 1, 2, AND 3.
4. ATTACHMENT B: DECLARATION OF ROBERT J. BONSIGNORE IN SUPPORT OF MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH DEFENDANTS JOSEPH CRAFT AND CRAFT FINANCIAL SOLUTIONS, INC., BASE COMMERCE, LLC, SYNOVUS BANK, AND CERTAIN RELATED PARTIES

/s/ Robert J. Bonsignore
Robert J. Bonsignore