# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF FLORIDA, FORT LAUDERDALE DIVSION

In re: 1 Global Capital LLC, et al., Debtors

Case No. 18-19121-RBR (Chap. 11)

#### OPT-OUT OF PAULA R. WELLS TO SETTLEMENT AND SETTLEMENT CLASS

Paula R. Wells (Claim No. 2092), pro se, respectfully opts out of the Settlement Class and, additionally, to the extent necessary to preserve her rights, objects to the proposed settlement and bar order (In Re: Wright, et al v. Pinnacle Plus Capital LLC, et al, Case No. 2019-018039-CA-01, Section CA 44 in the Circuit Court in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Complex Business Division) to the extent it would in any way limit or eliminate her ability to pursue her rights against Henry J. Wieniewitz a/k/a Trae Wieniewitz, Wieniewitz Financial LLC and Wieniewitz Wealth Management ("Wienewitz Parties"):

- 1. I request to be excluded from the Settlement Class in the Wright lawsuit.
- 2. I do not believe I have been given, or have been able to access, adequate information to enable me to make an informed decision as to whether this settlement will actually produce a meaningful and significant enough of a benefit and recovery to me to compensate me for relinquishing my rights against the Wieniewitz Parties.
- 3. Therefore, I opt out, and I decline and do not consent to being bound either by the proposed settlement or by the bar of my rights in this regard. RESPECTFULLY SUBMITTED this 14th day of

November 2019.

US BANKRUPTCY COURT SO DISTRICT OF FLA

NOV 1 5 2019

FILED\_\_\_\_\_RECEIVED\_\_\_\_

Paula R. Wells (Claim No. 2092)

2104 Windbrook Rd.

Knoxville, TN 37923

(865) 556-6111

wellspring318@gmail.com

### Certificate

I hereby certify that a true and correct copy of the foregoing objection was served upon the following by first class United States Mail, sufficient postage prepaid, addressed as follows:

Adam M. Moskowitz The Moskowitz Law Firm 2 Alhambra Plaza, Ste 601 Coral Gables, FL 33134

Paul J. Battista Genovese, Joblove & Battista 100 Southeast Second Street., 44<sup>th</sup> Floor Miami, FL 33131

Clerk of the Court Eleventh Judicial Circuit Court 73 W. Flagler Street, Suite 242 Miami, FL 33130

This: November 14, 2019

Paula R. Wells

IN THE CIRCUIT COURT IN THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

## COMPLEX BUSINESS DIVISION

Terrence P. Wright, et al.

v. Pinnacle Plus Capital LLC, et al.,

CASE NO. 2019-018039-CA-01

Section: CA 44

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Paul J. Battista Genovese, Joblove & Battista 100 Southeast Second Street., 44<sup>th</sup> Floor Miami, FL 33131

Clerk of the Bankruptcy Court 301 North Miami Avenue Miami, FL. 33128 Case No. 18-19121-RBR

This: November 14, 2019

Paula R. Wells