

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

1 Global Capital LLC, *et al.*,¹
Debtors.

Case No. 18-19121-RAM
(Jointly Administered)

1 Global Capital LLC,

Adv. Case No. 19-01540-RAM

Plaintiff,

v.

Bottego Enterprises, Inc. d/b/a
Precision Craftsmen and Alfred D.
Bottego,

Defendants.

PLAINTIFF'S EX PARTE MOTION FOR ISSUANCE OF ALIAS SUMMONS

Plaintiff 1 Global Capital LLC, pursuant to Rule 7004(e) of the Federal Rules of Bankruptcy Procedure, files this Ex-Parte Motion for Issuance of Alias Summons and states:

1. The summons in this adversary proceeding was issued September 15, 2019 ("Date of Issuance") [DE #2].

2. Pursuant to Rule 7004(e) of the Federal Rules of Bankruptcy Procedure, the

¹ The Debtors in the Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor's federal tax identification number, if applicable, are: 1 GC Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33009 (9517); and 1 West Collections, c/o Development Specialists, Inc., 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33009 (1711). On February 19, 2019, the Debtors registered the fictitious names "1 GC Collections" and "1 West Collections" with the Florida Department of State.

summons and complaint were required to be served by September 22, 2019, a date which was seven days after Date of Issuance.

3. Local Rule 7004-1(A), provides that if the summons was not timely served, the Clerk of Court will issue another summons.

WHEREFORE, Plaintiff respectfully requests the entry of an order, on ex-parte basis, directing the Clerk of Court to issue an alias summons in this adversary proceeding.

Dated: February 25, 2020

PERLMAN, BAJANDAS, YEVOLI &
ALBRIGHT, P.L.

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Possession*

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing has been served
this 25th day of February 2020.

By: /s/Jonathan S. Feldman

VIA U.S. MAIL

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