

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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In re:
1 Global Capital LLC, *et al.*,¹
Debtors.

Chapter 11
Case No. 18-19121-RAM
(Jointly Administered)

1 Global Capital LLC,
Plaintiff,

Adv. Case No.: 19-01843-RAM

v.

Chaires Security Contractors and
Investigations LLC and Harry Todd
Chaires,
Defendants.

**Plaintiff's Ex Parte Motion for Dismissal of
Party Defendant CHAIRES SECURITY CONTRACTORS AND INVESTIGATIONS
LLC**

Plaintiff 1 Global Capital, LLC, seeks an Order on an ex parte basis dismissing Defendant Chaires Security Contractors and Investigations LLC from this action and states:

1. Plaintiff commenced this action to collect on certain contractual obligations against the Defendants.
2. Pursuant to Fed. R. Civ. P. 21, “[o]n Motion or on its own, the court may at any time, on just terms, add or drop a party.”

¹ The Debtors in these 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 Global Capital LLC, d/b/a 1 GC Collections, c/o Development Specialists, Inc.: 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, FL 33009 (9517); and 1 West Capital LLC, d/b/a 1 West Collections, c/o Development Specialists, Inc.: 500 West Cypress Creek Road, Suite 400, Fort Lauderdale, FL 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.

3. Plaintiff requests that the court dismiss Defendant, Chaires Security Contractors and Investigations LLC from this action, without prejudice. Plaintiff intends to proceed against Harry Todd Chaires and requests that the caption in this action now reflect that only Harry Todd Chaires is a defendant to this action.

WHEREFORE, Plaintiff requests that the Court grant this Motion, Dismiss Defendant, Chaires Security Contractors and Investigations LLC from this action and grant such other relief the Court deems just and proper.

Dated: April 21, 2020

Respectfully Submitted,

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

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in Possession*

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing will be served upon the below listed parties on April 22, 2020.

By: /s/Jonathan S. Feldman

VIA U.S. MAIL

Harry Todd Chaires
3529 Raymond Diehl Rd.
Tallahassee, FL 32309-3142