

United States Bankruptcy Court
Southern District of Florida

1 Global Capital LLC,
Plaintiff
Platinum Rapid Funding Group, LTD.,
Defendant

Adv. Proc. No. 18-01495-RAM

CERTIFICATE OF NOTICE

District/off: 113C-1

User: oriol-ben

Page 1 of 3

Date Rcvd: Oct 19, 2020

Form ID: pdf004

Total Noticed: 12

The following symbols are used throughout this certificate:

Symbol **Definition**

+ Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 21, 2020:

Recip ID	Recipient Name and Address
ust	+ United States Trustee - FTM7/13, Timberlake Annex, Suite 1200, 501 E Polk Street, Tampa, FL 33602-3949
ust	+ United States Trustee - TPA7/13, Timberlake Annex, Suite 1200, 501 E Polk Street, Tampa, FL 33602-3949
	+ Platinum Rapid Funding Group LTD., 348 RXR Plaza, Uniondale, NY 11556-0348

TOTAL: 3

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
ust	+ Email/Text: USTPRegion21.MM.ECF@usdoj.gov	Oct 20 2020 00:38:00	Office of the US Trustee, 51 S.W. 1st Ave., Suite 1204, Miami, FL 33130-1614
ust	+ Email/Text: USTPRegion03.WL.ECF@USDOJ.GOV	Oct 20 2020 00:39:00	U.S. Trustee, Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801-3519
ust	+ Email/Text: ustpreion03.ne.ecf@usdoj.gov	Oct 20 2020 00:39:00	U.S. Trustee., US Dept of Justice, Office of the US Trustee, One Newark Center Ste 2100, Newark, NJ 07102-5235
ust	+ Email/Text: ustpreion21.at.ecf@usdoj.gov	Oct 20 2020 00:38:00	United States Trustee (cabrera), Office of the United States Trustee, 75 Ted Turner Dr., Suite 362, Atlanta, GA 30303-3330
ust	+ Email/Text: ustp.region21.or.ecf@usdoj.gov	Oct 20 2020 00:37:00	United States Trustee (davis), Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210
ust	+ Email/Text: ustp.region21.or.ecf@usdoj.gov	Oct 20 2020 00:37:00	United States Trustee - (ennever), Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210
ust	+ Email/Text: ustp.region21.or.ecf@usdoj.gov	Oct 20 2020 00:37:00	United States Trustee - JAX 13/7, Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210
ust	+ Email/Text: ustp.region21.or.ecf@usdoj.gov	Oct 20 2020 00:37:00	United States Trustee - ORL, Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210
ust	+ Email/Text: ustp.region21.or.ecf@usdoj.gov	Oct 20 2020 00:37:00	United States Trustee - ORL7/13, Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210

TOTAL: 9

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BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
dft		Platinum Rapid Funding Group, LTD.
ust	*+	United States Trustee - ORL7/13, Office of the United States Trustee, George C Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801-2210
ust	*+	United States Trustee - TPA7/13, Timberlake Annex, Suite 1200, 501 E Polk Street, Tampa, FL 33602-3949

TOTAL: 1 Undeliverable, 2 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 21, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 19, 2020 at the address(es) listed below:

Name	Email Address
Claudia Ojeda	on behalf of Plaintiff 1 West Capital LLC ojedac@gtlaw.com
Claudia Ojeda	on behalf of Plaintiff 1 Global Capital LLC ojedac@gtlaw.com
Eva Spahn	on behalf of Plaintiff 1 West Capital LLC spahne@gtlaw.com
Eva Spahn	on behalf of Plaintiff 1 Global Capital LLC spahne@gtlaw.com
John R. Dodd, Esq.	on behalf of Plaintiff 1 Global Capital LLC john.dodd@bakermckenzie.com bkcyecf@bakermckenzie.com
John R. Dodd, Esq.	on behalf of Plaintiff 1 West Capital LLC john.dodd@bakermckenzie.com bkcyecf@bakermckenzie.com
Kenneth B Robinson, Esq	on behalf of Defendant Global Merchant Cash Inc krobinson.ecf@rprslaw.com
Michael R Dal Lago	on behalf of Defendant Platinum Rapid Funding Group LTD. mike@dallagolaw.com, kim@dallagolaw.com
Paul J. Keenan, Jr., Esq.	on behalf of Plaintiff 1 Global Capital LLC paul.keenan@bakermckenzie.com bkcyecf@bakermckenzie.com
Paul J. Keenan, Jr., Esq.	on behalf of Plaintiff 1 West Capital LLC paul.keenan@bakermckenzie.com bkcyecf@bakermckenzie.com
Reginald Sainvil	on behalf of Plaintiff 1 West Capital LLC sainvilr@gtlaw.com
Reginald Sainvil	on behalf of Plaintiff 1 Global Capital LLC sainvilr@gtlaw.com
Richard B. Storfer, Esq.	on behalf of Defendant Global Merchant Cash Inc rstorfer@rprslaw.com

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Stephanie Peral
on behalf of Plaintiff 1 Global Capital LLC perals@gtlaw.com

Stephanie Peral
on behalf of Plaintiff 1 West Capital LLC perals@gtlaw.com

Stephen A Mendelsohn
on behalf of Plaintiff 1 Global Capital LLC mendelsohns@gtlaw.com hasenh@gtlaw.com

Stephen A Mendelsohn
on behalf of Plaintiff 1 West Capital LLC mendelsohns@gtlaw.com hasenh@gtlaw.com

TOTAL: 17



ORDERED in the Southern District of Florida on October 16, 2020.

**Robert A. Mark, Judge
United States Bankruptcy Court**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov**

In re: Chapter 11
1 GLOBAL CAPITAL LLC., et al.,¹ Case No. 18-19121-RBR
Debtor. (Jointly Administered)
Judge Raymond B. Ray

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1 GLOBAL CAPITAL, LLC and 1 WEST
CAPITAL GROUP, LLC,
Plaintiffs,

v. Adv. Pro. No. 18-01495-RBR

MOMENTUM AUTOMOTIVE
MANAGEMENT, LLC; MOMENTUM

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, 1250 E. Hallandale Beach Blvd., Suite 409, Hallandale Beach, FL 33009 (9517); and 1 West Capital LLC, 1250 E. Hallandale Blvd., Suite 409, Hallandale Beach, FL 33009 (1711).

AUTO GROUP, INC. f/k/a MOMENTUM
AUTO GROUP, LLC; RAHIM MAJID
HASSANALLY; VALLEJO CJD LLC;
FAIRFIELD IMPORTS, LLC; FAIRFIELD
IMPORTS TWO, LLC; FAIRFIELD IMPORT
THREE, LLC; VALLEJO IMPORTS, LLC
MAVERICK AUTO GROUP 2, LLC;
FAIRFIELD CJD, LP; RMHONE
CORPORATION; RMH III, INC.;
MOMENTUM RE, LLC; M.A.G. ONE
REINSURANCE LTD.; RADIUM2
CAPITAL, INC.; CAPITAL STACK, LLC;
PLATINUM RAPID FUNDING GROUP,
LTD.; and GLOBAL MERCHANT CASH,
INC., D/B/A WALL STREET FUNDING;
et al.,

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**ORDER GRANTING DAL LAGO LAW’S MOTION TO WITHDRAW AS COUNSEL
FOR DEFENDANT, PLATINUM RAPID FUNDING GROUP, LTD.**

THIS CASE came on for a hearing on October 8, 2020 at 2:00 p.m. for consideration of Dal Lago Law’s *Motion to Withdraw as Counsel for Defendant* (“**Motion**”) as attorney of record for Defendant, Platinum Rapid Funding Group, Ltd. (“**Platinum**”) [ECF No. 199]. After the Court’s due deliberation and review of the Motion, the relief requested therein, and the record set forth at the Hearing, it is hereby

ORDERED as follows:

1. The Motion is **GRANTED**, as set forth herein.
2. Unless otherwise defined herein, all capitalized terms shall have the meaning ascribed to them in the Motion.
3. Dal Lago Law is hereby relieved of all further responsibility in this case with respect to its representation of Platinum
4. Platinum shall have twenty-one (21) days from the date of this Order to obtain new counsel and for its new counsel to appear in this case.

5. As of the date of this Order all further pleadings and correspondence shall be forwarded to: Platinum Rapid Funding Group, Ltd. at the last known address of 348 RXR Plaza, Uniondale, NY 11556 and via email to: cmedlock@platinumrfg.com and tdiaz@platinumrfg.com until such time that Platinum obtains counsel, if any, to replace Dal Lago Law.

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Submitted by:

MICHAEL R. DAL LAGO

Florida Bar No. 0102185

Dal Lago Law

999 Vanderbilt Beach Road

Suite 200

Naples, Florida 34108

Telephone: (239) 571-6877

E-mail: mike@dallagolaw.com

Michael R. Dal Lago, Esq. is directed to serve a copies of this Order upon all interested parties and file a Certificate of Service with the Court.