

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

www.flsb.uscourts.gov

In re:
1 GLOBAL CAPITAL LLC, *et. al.*,¹

CASE NO.: 18-19121-BKC-RAM
CHAPTER 11

(Jointly Administered)

Debtors.

RAPID FINANCIAL SERVICES, LLC,

Plaintiff,

ADV. CASE NO.: 19-01849-RAM

v.

FITCREW USA, INC. and CHRISTINE
NAUD,

Defendants.

**JOINT STIPULATION OF DISMISSAL
OF ADVERSARY PROCEEDING**

Plaintiff, Rapid Financial Services, LLC (the “Plaintiff”), and Defendants, Fitcrew USA and Christine Naud (the “Defendants”), pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, as made applicable to this proceeding by Rule 7041 of the Federal Rules of Bankruptcy Procedure, stipulate to the dismissal of this proceeding, with each party bearing its own attorneys’ fees, costs, and expenses (the “Stipulation”).

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.

Pursuant to this Stipulation, the referenced Parties request that the Court enter an order of dismissal in the form attached hereto as **Exhibit A**.

DATED: Mach 30, 2021

Markowitz Ringel Trusty & Hartog, P.A.

Attorneys for the Plaintiff

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By: /s/ Alan R. Rosenberg

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DATED: March 30, 2021

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*electronically signed with permission

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record or pro se parties identified on the following Service List via the Court's CM/ECF notification to those parties who are registered CM/ECF participants in this case on March 30, 2021.

/s/ Alan R. Rosenberg
Alan R. Rosenberg

Service List

Via Electronic Mail Notice To:

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Francis L. Carter** flc@flcarterpa.com
- **David P Reiner** dpr@reinerslaw.com, eservice@reinerslaw.com
- **Alan R Rosenberg** arosenberg@mrthlaw.com,
gruiz@mrthlaw.com, jgarey@mrthlaw.com, ycandia@mrthlaw.com, mrthbkc@gmail.com

EXHIBIT A

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Defendants.

ORDER DISMISSING ADVERSARY PROCEEDING

THIS MATTER came before the Court on the Parties' *Joint Stipulation of Dismissal of Adversary*

Proceeding [ECF No. ____] (the “Stipulation”). The Court, having been informed of the Parties’ agreement to the dismissal of this adversary proceeding, **ORDERS** as follows:

1. The adversary proceeding is dismissed, with each party to bear their own attorneys’ fees and costs.

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Submitted by:

Alan R. Rosenberg, Esq.
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Tel: (305) 670-5000

Copies to:

Alan R. Rosenberg, Esq.
(Attorney Rosenberg is directed to mail a copy of this Order to all interested parties and to file a certificate of service).