

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.: 19-01569-RAM

v.

ACUTECH MOTORS, INC. and
BRYAN BRISBANE,

Defendants.

**JOINT STIPULATION OF DISMISSAL OF ADVERSARY
PROCEEDING PURSUANT TO SETTLEMENT AGREEMENT**

Plaintiff, Rapid Financial Services, LLC (the “Plaintiff”), and Defendants, Acutech Motors, Inc. and Bryan Brisbane (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 prejudice, 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: November 2, 2021

Markowitz Ringel Trusty & Hartog, P.A.
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DATED: November 2, 2021

The Bankruptcy Laws Offices of James Schwitalla, P.A.
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12954 SW 133rd Court
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By: /s/ Alan R. Rosenberg
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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 attached Service List via the Court's CM/ECF notification to those parties who are registered CM/ECF participants in this case and/or by U.S. Mail on November 2, 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.

- **Patrick L Cordero** ecfmail@pcorderolaw.com, r93260@notify.bestcase.com
- **Marcia T Dunn** mdunn@dunnlawpa.com, acastro@dunnlawpa.com; slebron@dunnlawpa.com; ecf.alert+dunn@titlexi.com
- **Bertis A Echols** bechols@evanspetree.com, sbruce@evanspetree.com
- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov

Via U.S. Mail To:

Synchrony Bank
PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

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 Pursuant to Settlement Agreement [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 in its entirety, with prejudice, with each party to bear their own attorneys’ fees and costs.
2. The Bankruptcy Court shall retain jurisdiction to enforce the terms of the Parties’ settlement agreement.

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Submitted by:

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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).