

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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In re:

Chapter 11

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

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

1 Global Capital LLC,

Adv. Case No. 19-01521-RAM

Plaintiff,

v.

Juan A. Mendez,

Defendants.

EX PARTE MOTION TO AMEND FINAL JUDGMENT NUNC PRO TUNC

Plaintiff, 1 Global Capital, LLC, by and through undersigned counsel, hereby seeks to amend the Final Judgment pursuant to Fed.R.Civ.P. 60(a), made applicable by Fed.R.Bank.P. 9042 and in support thereof, states as follows:

1. This Court entered Final Judgment on May 22, 2020 [D.E. 21 and D.E. 22].
2. Subsequently, Plaintiff discovered that the Judgment Creditor's name was omitted on the Final Judgment as a result of an accidental scrivener's error.
3. Specifically, the Judgment Creditor's name was omitted "1 Global Capital LLC"
4. Fed.R.Civ.P. 60(a) in pertinent part provides:

The court may correct a clerical mistake or a mistake arising from oversight or omission whenever one is found in a judgment, order, or other part of the record. The court may do so on motion or on its own, with or without notice.

5. An Amended Final Judgment to correct the clerical mistake would not change the substance of the record, and is proper under the circumstances.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Amended Final Judgment, *nunc pro tunc*, thereby correcting the Judgment Creditor's name to read as "1 Global Capital LLC", and for such other relief as this Court deems proper.

Dated: December 20, 2024

By: /s/ Darla Grondin
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Attorney for Rapid Financial Services, LLC,
assignee of 1 Global Capital LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Satisfaction of Judgment was served on December 20, 2024 via U.S. Mail upon the parties listed on the below service list.

/s/ Darla Grondin
Darla Grondin, Esq.

Service List:

Juan A. Mendez
10142 Springhouse Court
Manassas, VA 20110