

68% MCA SETTLEMENT
BANK ACCOUNT FROZEN
Index No. [REDACTED]

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made and entered into by and between [REDACTED] CAPITAL GROUP, LLC ("RCG"), and [REDACTED] and [REDACTED] (collectively, the "Defendants").

WHEREAS, on November 17, 2017, a Judgment by Confession was entered, jointly and severally, against the Defendants, in the above-referenced case in Richmond County, New York (the "Judgment");

WHEREAS, shortly after obtaining the Judgment, [REDACTED] directed New York City Marshal Stephen W. Biegel to serve a Levy (the "Levy") upon PNC Bank on November 20, 2017;

WHEREAS, the Parties to this Agreement desire to settle and resolve this action and all other outstanding issues between and among them in the amount of \$27,864.16 ("Settlement Amount");

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. Defendants agree and stipulate to the propriety, legality and enforceability of the Judgment and the accuracy of the Judgment Amount as of the date of entry of the Judgment, as well as the propriety, sufficiency, and legality of the Levy and Enforcement Documents, and hereby waive any and all defenses and counterclaims that could be asserted in this action, including any and all jurisdictional defenses and debt collection practice statutes;
2. Defendants shall pay the Settlement Amount of \$27,864.16 ("Settlement Amount") to [REDACTED] as follows: (i) a release of \$27,864.16 to Marshal Biegel c/o [REDACTED] by PNC Bank via Direction Letter signed by Defendants.
3. In the event of a breach of this Agreement by Defendants, [REDACTED] shall not be required to file a satisfaction of Judgment, and may serve judgment enforcement mechanisms as