IN THE COUNTY COURT OF THE 11<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO.: 17-022451 CA (15

TANGIERS GLOBAL, LLC,
Plaintiff,
v.
JOEY NEW YORK, INC., et al.
Defendants.

## NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Plaintiff, Tangiers Global, LLC by and through undersigned counsel, hereby file this Notice of Voluntary Dismissal Without Prejudice of the claims brought by Plaintiffs against Defendants Joey Chancis and Richard Roer in the above-captioned matter.<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Plaintiff may continue to pursue collection efforts in connection with its judgment against Joey New York, Inc. and may pursue claims against other defendants for fraudulent transfers.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal (<a href="mailto:eservice@myfloourtaccess.com">eservice@myfloourtaccess.com</a>) upon Richard Roer, Esq., Richardroer1@gmail.com; Joey Lee Chancis, <a href="mailto:jcfreedom2018@gmail.com">jcfreedom2018@gmail.com</a>; and Joey New York, Inc. c/o Richard Chancis, <a href="mailto:resound@bellsouth.net">resound@bellsouth.net</a> this 4th day of November, 2021.

/s/Aaron S. Blynn
Attorney