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10 **THE UNITED STATES DISTRICT COURT**
 11 **FOR THE DISTRICT OF NEVADA**
 12 **(SOUTHERN DIVISION)**

13 GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian
 corporation, KILLSHUNT REALTY and DEVELOPMENT
 14 CORPORATION, a privately held corporation registered in the
 Philippines, and Craig Johnson, individually,

13-cv-1750-RCJ- (CWH)

[Amended Proposed]

Plaintiffs,

vs.

Default Judgment
Fed. R. Civ P. 55

16 Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc
 17 A. Grossman, Julia B. Sylva, individually and collectively the RICO
 Person Defendants,

and

18 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
 19 International, LLC., GrupoMex Latin America, GrupoMex LLC., and
 20 XCELL Security House, S.A. Enterprise Members, Defendants in
 Possession of Converted Assets,

and

22 Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen,
 23 Joel Davies, Robert Saroukhanoff, John Doe and Jane Roe, 1-5,
 24 individually and as Directors/Officers Members and/or Employees of
 GrupoMex Enterprise LLC., Enterprise members individual
 25 Defendants Aiding/Abetting in Negligence,

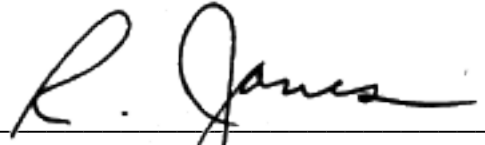
Defendants.

27 The defendant(s), Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute,
 28 individually, and GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex

Default Judgment

1 International, LLC., GrupoMex Latin America, GrupoMex LLC., having failed to
2 appear, plead or otherwise defend in this action; default having been entered on
3 September 11, 2104; counsel for plaintiff(s) having requested judgment against the
4 defaulted defendant(s) and having filed a proper motion and declaration-exhibits in
5 accordance with Federal Rule of Civil Procedure 55 (a) and (b); judgment is hereby
6 granted on the complaint for the equitable, and injunctive claims of conversion with the
7 Court imposing a constructive trust and turnover of the assets of the defendant Leticia R.
8 Castro held by the defendant XCell Security House and Financial, SA with an award in
9 monetary damages to be entered in favor of plaintiff(s) Gold Leaf Overseas SA 4128, a
10 privately held Panamanian corporation, Killshunt Realty and Development Corporation, a
11 privately held corporation registered in the Philippines, and Craig Johnson, individually
12 against Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, GrupoMex
13 Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex International, LLC., GrupoMex
14 Latin America, GrupoMex LLC.; and the Court further directs entry of a judgment in
15 favor of the Plaintiffs Gold Leaf Overseas SA 4128 for a sum certain in the amount of
16 One Million Three Hundred Thousand (\$1,300,000.00) Dollars; in the case of Killshunt
17 Realty and Development Corporation for a sum certain in the amount of Nine Hundred
18 Thousand (\$900,000.00) Dollars; and in the case of Craig Johnson a sum certain in the
19 amount of One Million Three Hundred Thousand (\$1,500,000.00) with a an award of pre
20 judgement interest at a rate of 23.5% from October 10, 2010 with the calculations for
21 accumulated interest being for Gold Leaf Overseas SA4128 in the amount of Two
22 Million Three Hundred-Five Thousand Seven Hundred Eighty-Nine Dollars plus 04/00
23 Cents (\$2,305,789.04); for Killshunt Realty and Development Corporation in the amount
24 of One Million Five Hundred Ninety-Six Thousand Three Hundred-Fifteen Dollars plus
25 49/00 Cents (\$1,596,315.49); and for Craig Johnson in the amount of Two Million Six
26 Hundred-Sixty Thousand Five Hundred Twenty-Five Dollars plus 81/00 Cents
27 (\$2,660,525.81), as against defendants Leticia R. Castro, Martha B. Castro, James a/k/a
28 Jimmy Matute, GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex

1 International, LLC., GrupoMex Latin America, GrupoMex LLC.; together with legal fees
2 in the sum of Twenty Thousand Dollars (\$20,000.00); plus interest on the judgment at the
3 legal rate until the judgment is satisfied.



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5 HON. ROBERT C. JONES, USDC JUDGE

6 Dated this 25th day of August, 2015.
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CERTIFICATE OF SERVICE

I hereby certify that, in accordance with the Rules, on this date August, 2015, a true and correct copy of the foregoing document Corrected Proposed Judgment was delivered to Defendants of Record, by both ECF means and by 1st class mail or through their Counsel of Record.

Addressee: Name(s) and address (es) of defendant(s) and record Counsel:

Leticia R. Castro:
345 Durango Drive, Ste. B-107-249 Las Vegas, Nevada 89113
5 Chateau Drive Whistler Street, Las Vegas Nevada 89148

Martha B. Castro:
7345 Durango Drive, Ste. B-107-249 Las Vegas, Nevada 89113
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James a/k/a Jimmy Matute:
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GrupoMex LLC:
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Xcell Security House S.A. [**On consent by e-service Lynnwood Farr-President.**]
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1005 Lausanne, Switzerland

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Respectfully submitted:

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