

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**COMPLETE BUSINESS SOLUTIONS GROUP,
INC. d/b/a/ PAR FUNDING, et al.,**

AGREED MOTION TO STAY THIS CASE AS TO DEFENDANT JOHN GISSAS

Plaintiff Securities and Exchange Commission hereby requests a 90-day stay of this case as to Defendant John Gissas only.

Undersigned counsel and counsel for Mr. Gissas have been engaged in settlement discussions to resolve this case in full. We have reached a tentative settlement as to all but one issue and anticipate we will resolve that remaining issue this week. We require time to finalize the settlement papers and to obtain authorization from the Commissioners of the S.E.C. to enter into the settlement agreement. The settlement anticipated, if authorized, would resolve all claims against Mr. Gissas. This would obviate the need for Mr. Gissas to file an answer to the Complaint, to litigate this case, and to have a trial against Mr. Gissas.

In the event we cannot finalize the settlement papers or the Commission does not authorize the proposed settlement, we would notify this Court immediately so the stay can be lifted.

The stay would not impact any other defendant in this case.

WHEREFORE, the Commission respectfully requests a 90-day stay of this case, including all litigation deadlines, against Mr. Gissas only.

CERTIFICATE OF CONFERRAL

Undersigned counsel conferred with counsel for Defendant John Gissas, who agrees to the relief sought herein.

October 26, 2020

Respectfully submitted,

By: s/ Amie Riggle Berlin
Amie Riggle Berlin
Senior Trial Counsel
Florida Bar No. 630020
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Attorney for Plaintiff

**SECURITIES AND EXCHANGE
COMMISSION**

801 Brickell Avenue, Suite 1800
Miami, Florida 33131
Telephone: (305) 982-6300
Facsimile: (305) 536-4154

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 26th day of October 2020 via cm-ecf on all defense counsel in this case.

s/ Amie Riggle Berlin
Amie Riggle Berlin

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/

**ORDER GRANTING AGREED MOTION TO STAY THIS CASE
AS TO DEFENDANT JOHN GISSAS**

This cause comes before the Court upon Agreed Motion to Stay this Case as to Defendant John Gissas for 90 days. The Plaintiff and Defendant Gissas have reached a tentative settlement and require the time to finalize the settlement papers and obtain authorization from the Commissioners of the SEC, after reviewing the Motion and otherwise being duly advised.

IT IS HEREBY ORDERED that the Stay of 90 days as to Defendant Gissas **IS GRANTED**. This case is stayed as to Defendant Gissas and the Plaintiff shall have 90 days from the date of this order to obtain settlement authorization from the Commissioners.

DONE and **ORDERED** in Fort Lauderdale, Florida, this ____ day of October 2020.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to; Counsel of Record