

**UNITED STATES DISTRICT COURT
FOR THE 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.*

Defendants.

**RECEIVER, RYAN K. STUMPHAUZER’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE FIRST APPLICATION FOR ALLOWANCE AND
PAYMENT OF PROFESSIONALS’ FEES AND REIMBURSEMENT OF EXPENSES**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, files this Unopposed Motion for Extension of Time to File First Application for Allowance and Payment of Professionals’ Fees and Reimbursement of Expenses (the “First Application”), and states:

1. On August 13, 2020, the Court entered its Amended Order Appointing Receiver (ECF No. 141) (the “Operative Receivership Order”).

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding; Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC.

2. The Operative Receivership Order empowers the Receiver to “engage and employ persons in his discretion to assist him in carrying out his duties and responsibilities hereunder, including, but not limited to, accountants, attorneys, securities traders, registered representatives, financial or business advisers, liquidating agents, real estate agents, forensic experts, brokers, traders or auctioneers.” *See* Operative Receivership Order at ¶ 7(F). Moreover, the “Receiver and his Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates,” subject to approval of the Court. *See* Operative Receivership Order at ¶ 58.

3. The Operative Receivership Order provides that the Receiver is to file applications for reasonable compensation “within forty-five (45) days after the end of each calendar quarter.” *Id.* at ¶ 59. The first calendar quarter of this Receivership concluded on September 30, 2020, and, thus, the Receiver’s First Application would be due pursuant to the terms of the Operative Receivership Order on November 16, 2020.

4. This will be the Receiver’s initial Application to the Court for compensation. Because this is the initial Application, and because it includes requests for compensation from several different Retained Personnel that performed considerable amounts of work in this Application Period, the Receiver has been required to spend substantial time reviewing and finalizing this First Application.

5. At least thirty (30) days prior to filing the First Application, the Receiver must serve a complete copy of the proposed First Application upon the Securities and Exchange Commission (“SEC”). *See* Operative Receivership Order at ¶ 59. The Receiver is currently in the process of finalizing this submission to the SEC.

6. Accordingly, in light of the timing requirements under the Operative Receivership Order, the Receiver requests a one-month extension of time, through and including December 16, 2020, within which to file the First Application.

7. The Receiver has conferred with the SEC, which does not oppose this request for an extension of time.

8. A proposed Order granting this requested extension of time is attached hereto as Exhibit 1.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant an extension of time, through and including December 16, 2020, for the Receiver to file the First Application.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

Pursuant to Local Rule 7.1, undersigned counsel has conferred with the Securities and Exchange Commission, which has confirmed that it does not oppose the relief requested herein.

Dated: November 12, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 12, 2020, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya
TIMOTHY A. KOLAYA