

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**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.

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**DEFENDANT LISA MCELHONE'S RESPONSE  
IN OPPOSITION TO THE RECEIVER'S MOTION TO FILE  
UNREDACTED COPIES OF LISA MCELHONE'S PERSONAL  
FINANCIAL STATEMENTS AND RELATED COMMUNICATIONS**

Defendant Lisa McElhone, by and through her attorney, respectfully submits this response in opposition to the Receiver's Motion to File Unredacted Copies of Lisa McElhone's Personal Financial Statements and Related Communications (ECF 415) (the "Motion").

The Receiver filed the Motion on December 1, 2020. Since that time, counsel for the Receiver and counsel for the Defendants, including counsel for Ms. McElhone, have been negotiating discovery issues including the language of a Protective Order. Any such Protective Order would cover the very materials at issue in the Motion. And, such Protective Order would also include a procedure for the determination of Confidentiality.

Further, counsel for Ms. McElhone has not seen the unredacted portions that the

Receiver proposes to un-redact. Accordingly, counsel cannot fully address the application. We note that the Receiver has expressed concerns about similar kinds of materials to those they propose to un-redact.

Undersigned counsel therefore proposes that the materials the Receiver proposes to un-redact and make public first be provided in unredacted form to defense counsel. Second, assuming that a Protective Order is in place, undersigned counsel will make a determination whether he chooses to designate such materials as Confidential Material. If so, and if such designation is opposed by the Receiver, a determination can be made in the regular course before the Magistrate or this Court.

For these reasons, it is respectfully requested that the Motion should be deferred pending resolution as indicated above.

Dated: New York, New York  
December 15, 2020

By: /s/ Alan S. Futerfas  
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*Attorney for Defendant*  
*Lisa McElhone*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on December 15, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

s/Joel Hirschhorn  
JOEL HIRSCHHORN