

**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.,**

**PLAINTIFFS' UNOPPOSED MOTION TO FILE ONE MOTION TO STRIKE
AFFIRMATIVE DEFENSES AGAINST DEFENDANTS**

Plaintiff Securities and Exchange Commission respectfully requests leave to file one Motion to Strike affirmative defenses against the Defendants.

Each individual Defendant filed a separate Answer and Affirmative Defenses, for a total of six that were filed on May 25, 2021 by Defendant Vagnozzi, June 1, 2021 by Defendants LaForte, Barleta and McElhone, and June 8, 2021, by Defendants Abbonizio and Furman. Thus, the Commission's Motions to Strike are due starting June 15, 2021, as to Vagnozzi, and ending June 29, 2021, as to Abbonizio and Furman. There is considerable overlap between the Defendants' Affirmative Defenses. Rather than file 6 separate Motions, the Commission seeks leave to file one Motion addressing all of them by no later than Monday, June 21, 2021.

June 16, 2021

Respectfully submitted,

By: Amie Riggle Berlin
Amie Riggle Berlin
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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

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CERTIFICATE OF CONFERRAL

Undersigned Counsel conferred with Defendant's counsel, who do not oppose the motion.

Amie Riggle Berlin

Amie Riggle Berlin

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 16th day of June 2021 via cm-ecf on all defense counsel and Pro Se Defendants in this case.

Amie Riggle Berlin

Amie Riggle Berlin

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/

**ORDER GRANTING UNOPPOSED MOTION TO FILE ONE MOTION TO STRIKE
AFFIRMATIVE DEFENSES AGAINST DEFENDANTS**

THIS MATTER came before the Court upon Plaintiff, Securities and Exchange Commission's Unopposed Motion to File One Motion to Strike Affirmative Defenses Against Defendants. The Court having reviewed the motion and the record and finding good cause for the Plaintiff's request and the motion being unopposed,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. Plaintiff shall have until Monday, June 21, 2021 to file One Motion to Strike Affirmative Defenses Against Defendants.

DONE and ORDERED in Fort Lauderdale, Florida, this ____ day of June 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: All Counsel of Record and *ProSe* Defendant