

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(West Palm Beach)

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.

**NON-PARTY’S, LEAD FUNDING II, LLC, UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE REPLY IN FURTHER SUPPORT OF AMENDED MOTION TO
INTERVENE AND LIFT LITIGATION INJUNCTION TO ALLOW IT TO PROCEED
WITH FORECLOSURE ACTION IN COLORADO STATE COURT**

The Non-Party, LEAD FUNDING II, LLC, a Colorado limited liability company (“Lead Funding”), by and through its undersigned attorneys, and without opposition from the Receiver, hereby moves the Court for an additional five (5) days through and including July 6, 2021, within which to file its reply (the “Reply”) in further support of its Amended Motion to Intervene and Lift Litigation Injunction to Allow It to Proceed with Foreclosure Action in Colorado State Court (the “Amended Motion”) [ECF No. 616] and in response to the Receiver’s Response to the Amended Motion (the “Response”) [ECF No. 629], and states:

1. On June 9, 2021, Lead Funding filed its Amended Motion.
2. On June 23, 2021, the Receiver filed his Response.
3. Pursuant to this Court’s Local Rule 7.1(c)(1), Lead Funding is currently due to file its Reply by June 30, 2021.

4. However, at this time, due to the ongoing negotiations between Lead Funding and the Receiver in connection with this matter, as well as the press of other business of Lead Funding's undersigned attorneys, Lead Funding respectfully requests a five-day extension of time through and including July 6, 2021, within which to prepare and file its Reply.

5. Lead Funding makes this request in good faith and without any dilatory motives or other improper purpose.

6. The undersigned has conferred with the Receiver's attorneys and is authorized to represent that the Receiver has no objection to the granting of this motion and the relief requested herein.

7. Attached is a proposed Agreed Order granting this motion.

WHEREFORE, Lead Funding respectfully requests that the Court enter an order granting it a five-day extension of time through and including July 6, 2021, within which to file its Reply in further support of its Amended Motion and granting such other and further relief as the Court deems just and proper.

Dated: June 30, 2021

Respectfully submitted,

LOGS LEGAL GROUP LLP
Attorneys for Lead Funding II, LLC
2424 North Federal Highway, Suite 360
Boca Raton, FL 33431
561-287-5599 (phone)
561-287-5589 (fax)

By: /s/ Ronald M. Gaché

Ronald M. Gaché, Esq.
Florida Bar No. 699306
rgache@logs.com
Scott A. Simon, Esq.
Florida Bar No. 0088676
ssimon@logs.com

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I HEREBY CERTIFY that, pursuant to Local Rule 7.1, I contacted and conferred with the attorneys for the Receiver (the only party which filed a Response to the Amended Motion) in a good faith effort to resolve the issues raised in this motion and, based on those communications, state that the Receiver does not oppose this motion.

By: /s/ Ronald M. Gaché
Ronald M. Gaché, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Notice of Electronic Filing by CM/ECF transmission to all counsel and parties who are registered to receive such service in this case on June 30, 2021.

By: /s/ Ronald M. Gaché
Ronald M. Gaché, Esq.

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COMPLETE BUSINESS SOLUTIONS GROUP, INC.
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Defendants.

[PROPOSED]
AGREED ORDER GRANTING NON-PARTY'S, LEAD FUNDING II, LLC,
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN
FURTHER SUPPORT OF AMENDED MOTION TO INTERVENE AND
LIFT LITIGATION INJUNCTION TO ALLOW IT TO PROCEED
WITH FORECLOSURE ACTION IN COLORADO STATE COURT

THIS CAUSE having come before the Court on the Non-Party's, Lead Funding II, LLC, Unopposed Motion for Extension of Time to File Reply in Further Support of Amended Motion to Intervene and Lift Litigation Injunction to Allow It to Proceed with Foreclosure Action in Colorado State Court (the "Amended Motion"), and the Court having reviewed the motion, noting no objections thereto and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Non-Party's, Lead Funding II, LLC, Unopposed Motion for Extension of Time to File Reply in Further Support of Amended Motion to Intervene and Lift Litigation Injunction to Allow It to Proceed with Foreclosure Action in Colorado State Court is hereby **GRANTED**.

2. The Non-Party, Lead Funding II, LLC, shall have an additional five (5) days through and including July 6, 2021, within which to file its Reply in further support of its Amended Motion.

DONE AND ORDERED in Chambers at West Palm Beach, Florida, this ____ day of June, 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record