

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

CASE NO.: 9:20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

**DEFENDANT DEAN VAGNOZZI'S UNOPPOSED MOTION FOR AN EXTENSION OF
TIME TO RESPOND TO PLAINTIFF SECURITIES AND EXCHANGE
COMMISSION'S MOTION TO CONSTRUE SOME AFFIRMATIVE DEFENSES AS
DENIALS, AND TO STRIKE OTHERS**

Defendant Dean Vagnozzi, by and through his undersigned counsel, hereby requests an extension of time to file his response to Plaintiff's Motion to Construe some Affirmative Defenses as Denials, and to Strike Others [D.E. 627] (the "Plaintiff's Motion"). In further support of this motion, Defendant states as follows:

1. Plaintiff's Motion to Construe some Affirmative Defenses as Denials, and to Strike Others [D.E. 627] was filed on June 21, 2021.
2. Defendant Dean Vagnozzi's response to Plaintiff's Motion is currently due on July 6, 2021.
3. Defendant Dean Vagnozzi requests a two (2) week extension of this deadline to file his response, through and including July 20, 2021.
4. In light of prior commitments of counsel, and discussions with Plaintiff to attempt to resolve the issues raised in Plaintiff's Motion, Defendant Dean Vagnozzi is in need of additional

time to respond to the arguments in Plaintiff's Motion and to continue to confer with Plaintiff's counsel on said Motion.

5. Defendant Dean Vagnozzi intends to file a separate response to Plaintiff's Motion on his behalf only, and thus this request is made only on his behalf.

6. The request is made in good faith and not for any improper purpose. The requested enlargement will not prejudice any party.

7. Counsel for Defendant Dean Vagnozzi has conferred with counsel for Plaintiff regarding the requested enlargement, and counsel for Plaintiff has advised that she does not oppose the relief requested, but only agrees to an enlargement of time for Defendant Dean Vagnozzi.

WHEREFORE, Defendant Dean Vagnozzi requests that this Court enter an order extending the time to file his response to Plaintiff's Motion to Construe some Affirmative Defenses as Denials, and to Strike Others through and including July 20, 2021.

DATED: JULY 2, 2021

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Attorneys for Dean Vagnozzi

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3) counsel for the movant has conferred with Plaintiff's counsel and Plaintiff's counsel does not oppose this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of July 2021, a true and correct copy of the foregoing was served via the Court's CM/ECF System upon all counsel of record.

/s/ Brian P. Miller
Brian P. Miller, Esq.

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Defendants.

_____/

**ORDER GRANTING DEFENDANT DEAN VAGNOZZI'S UNOPPOSED MOTION FOR
AN EXTENSION OF TIME TO RESPOND TO PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S MOTION TO CONSTRUE SOME AFFIRMATIVE
DEFENSES AS DENIALS, AND TO STRIKE OTHERS**

THIS MATTER is before the Court upon Defendant Dean Vagnozzi's Unopposed Motion for an Extension of Time to Respond to Plaintiff Securities and Exchange Commission's Motion to Construe Some Affirmative Defenses as Denials, and To Strike Others [D.E. ___], filed on July 2, 2021.

The Court, having reviewed the Motion, and the Court being advised that the parties have reached an agreement on said Motion, and being fully advised in the premises, hereby ORDERS and ADJUDGES that Defendant Dean Vagnozzi's Unopposed Motion for an Extension of Time to Respond to Plaintiff Securities and Exchange Commission's Motion to Construe Some Affirmative Defenses as Denials, and To Strike Others is GRANTED. Defendant Dean Vagnozzi shall serve a response to Plaintiff Securities and Exchange Commission's Motion to Construe Some Affirmative Defenses as Denials, and To Strike Others on or before **July 20, 2021**.

DONE and ORDERED in Chambers, Miami, Florida, this ___ day of July 2021.

RODOLFO A. RUIZ
UNITED STATES DISTRICT JUDGE