

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
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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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSES IN OPPOSITION TO PLAINTIFF'S MOTION TO CONSTRUE SOME  
AFFIRMATIVE DEFENSES AS DENIALS AND STRIKE OTHERS**

Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta (“Defendants”), by and through their attorneys, respectfully file this Unopposed Motion pursuant to Fed. R. Civ. P. 6(b) for a one-week extension of time to file their respective Responses in Opposition to the Securities and Exchange Commission’s (“SEC” or Commission”) Motion to Construe Some Affirmative Defenses as Denials, and to Strike Others (DE 627). In support thereof, Defendants state as follows:

1. On August 10, 2020, the Commission filed its Amended Complaint against Defendants. (DE 119).
2. On June 1, 2021, Defendants filed their respective Answers with the Court, each raising seven affirmative defenses. (DE 607, 608, 609).
3. On June 21, 2021, the Commission filed its Motion to Construe Some Affirmative Defenses as Denials, and to Strike Others (the “Motion”). (DE 627).
4. As such, Defendants’ respective Responses in Opposition to the Commission’s Motion are due today, July 6, 2021.
5. Defendants request a one-week extension of this deadline to file their respective

Responses on or before July 13, 2021.

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

7. Undersigned counsel has conferred with counsel for the Commission, who advised she has **no objection** to the relief requested.

**WHEREFORE**, Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta request that this Court enter an order extending the time to file their respective Responses in Opposition to the Commission's Motion to Construe some Affirmative Defenses as Denials, and to Strike Others through and including July 13, 2021.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2021, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: /s/ Joel Hirschhorn  
Joel Hirschhorn

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 9:20-CV-81205-RAR

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

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

Defendants.

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**ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSES IN OPPOSITION TO PLAINTIFF'S MOTION TO  
CONSTRUE SOME AFFIRMATIVE DEFENSES AS DENIALS AND STRIKE OTHERS**

**THIS CAUSE** having come before the Court on Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta's Unopposed Motion for Extension of Time to File Responses in Opposition to the Securities and Exchange Commission's Motion to Construe Some Affirmative Defenses as Denials and to Strike Others. Being fully advised, it is hereby:

**ORDERED AND ADJUDGED** that Defendants' Motion is **GRANTED**. Defendants shall file their respective Responses in Opposition to the Securities and Exchange Commission's Motion to Construe Some Affirmative Defenses as Denials and to Strike Others on or before July 13, 2021.

**DONE AND ORDERED** in Chambers in the United States District Court, Southern District of Florida, this \_\_\_\_\_ day of July, 2021.

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HONORABLE RODOLFO A. RUIZ II  
UNITED STATES DISTRICT JUDGE

Copies furnished to: All Counsel of Record