

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

CASE NO. 20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

vs.

COMPLETE BUSINESS SOLUTION GROUP,
INC. D/B/A PAR FUNDING, ET AL.,

Defendant(s).

**DEFENDANT PERRY S. ABBONIZIO'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE IN OPPOSITION TO PLAINTIFF'S
MOTION TO CONSTRUE SOME AFFIRMATIVE DEFENSES
AS DENIALS AND STRIKE OTHERS**

Defendant Perry S. Abbonizio, by and through his attorneys, respectfully files this Unopposed Motion under Fed. R. Civ. P. 6(b) for a one-week extension of time to file his Response in Opposition to the Securities and Exchange Commission's ("SEC") Motion to Construe Some Affirmative Defenses as Denials, and to strike others (D.E. 627). In support, Defendant states as follows:

1. On August 10, 2020, the SEC filed its Amended Complaint against Defendant. (D.E. 119).
2. On June 8, 2021, Defendant filed his Answer with the Court, raising nineteen affirmative defenses. (D.E. 615).
3. On June 21, 2021, the SEC filed its Motion to Construe Some Affirmative Defenses as Denials, and to Strike Others (the "Motion"). (D.E. 627).
4. Defendant's Response in Opposition to the Motion is due today, July 6, 2021.

5. Defendant requests a one-week extension of this deadline to file a Response on or before July 13, 2021.

6. This request is made in good faith and not for any improper purpose, and the extension will not prejudice any party.

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

WHEREFORE, Defendant Perry S. Abbonizio requests that this Court enter an order extending the time to file his Response in Opposition to the SEC's Motion through and including July 13, 2021.

Date: July 6, 2021

Respectfully submitted,

/s/ Brandon S. Floch
Jeffrey E. Marcus
Fla Bar No. 310890
Jason L. Mays
Florida Bar No. 106495
Brandon S. Floch
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Counsel for Perry S. Abbonizio

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with the SEC and represents that the SEC does not oppose the relief requested in this Motion.

By: /s/ Brandon S. Floch
Brandon S. Floch

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/ Brandon S. Floch
Brandon S. Floch

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

vs.

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INC. D/B/A PAR FUNDING, ET AL.,

Defendant(s).

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

THIS CAUSE having come before the Court on Defendant Perry S. Abbonizio's Unopposed Motion for Extension of Time to File a Response 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 Defendant's Motion is **GRANTED**. Defendant shall file his Response 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.

HONORABLE RODOLFO A. RUIZ II
UNITED STATES DISTRICT