

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

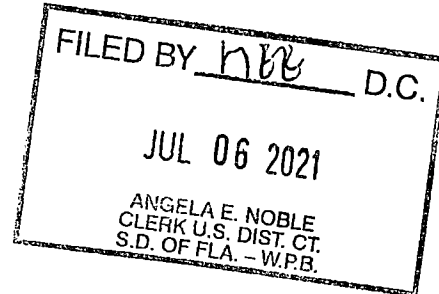
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.



**DEFENDANT MICHAEL FURMAN'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 Michael Furman, ProSe, 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 Michael Furman's response to Plaintiff's Motion is currently due on July 6, 2021.
3. Defendant Michael Furman requests a one (1) week extension of this deadline to file his response, through and including July 13, 2021.
4. In light of prior commitments for legal aid help and discussions with Plaintiff to attempt to resolve the issues raised in Plaintiff's Motion, Defendant Michael Furman 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. The request is made in good faith and not for any improper purpose. The requested enlargement will not prejudice any party.

6. Defendant Michael Furman 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 Michael Furman.

WHEREFORE, Defendant Michael Furman 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 13, 2021.

DATED: JULY 6, 2021

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CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3) 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 6th 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/ Michael C Furman
Michael C Furman, ProSe

**UNITED STATES DISTRICT COURT
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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.

**ORDER GRANTING DEFENDANT MICHAEL C FURMAN'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 Michael C Furman'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 6, 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 Michael Furman'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 Michael Furman 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 13, 2021**.

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

RODOLFO A. RUIZ
UNITED STATES DISTRICT JUDGE