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

SECURITIES AND EXCHANG	ЗE
COMMISSION,	

Plaintiff,

v.

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

Defendants.

# RECEIVER, RYAN K. STUMPHAUZER'S FOURTEENTH MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,<sup>1</sup> by and through his undersigned counsel, hereby files this Fourteenth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings, and states as follows:

<sup>&</sup>lt;sup>1</sup> The "Receivership Entities" are Complete Business Solutions Group, Inc. d/b/a Par Funding ("Par Funding"); Full Spectrum Processing, Inc. ("Full Spectrum"); ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment Fund 2 LP; MK Corporate Debt Investment Company LLC; Capital Source 2000, Inc.; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consultants, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; The

- 1. The Receiver hereby moves this Court to lift the Litigation Injunction for the limited purpose of allowing the Receiver, in his discretion, to mark judgments satisfied, where the counterparty merchant either has resolved or satisfied a confessed judgment entered in the Court of Common Pleas of Philadelphia County, Pennsylvania.<sup>2</sup>
- 2. After reviewing the books and records of the Receivership Entities and conferring with the Receiver's consultant, Development Specialists, Inc., the Receiver has reviewed the status of various proceedings involving open Confessions of Judgment, and has confirmed that a number of confessed judgments should have been marked satisfied prior to the entry of the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141].
- 3. Attached as Exhibit 1 hereto is a list of cases that are currently open in the Court of Common Pleas of Philadelphia County, Pennsylvania, and for which the Receiver has determined that the obligation underlying the confessed judgment had been satisfied pre-Receivership.
- 4. The Receiver has determined, in his professional judgment, that it is in the best interests of the Receivership Estate to mark the judgments satisfied with respect to these cases, as the existence of these confessed judgments may impact the Merchant, the Guarantor, and the financial institutions potentially involved in garnishment proceedings. In addition, marking these

LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; and LM Property Management LLC; and the Receivership also includes the properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter FL 33477; 2413 Roma Drive, Philadelphia, PA 19145.

<sup>&</sup>lt;sup>2</sup> See the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] (the "Operative Receivership Order"). The Receiver generally incorporates the background section of his prior Motions to Lift Litigation Injunction as to Certain Garnishment Proceedings. [See, e.g., ECF Nos. 111, 145, 198, 232, and 264.]. To conserve resources and promote efficiency, the Receiver is providing only a summary narrative, as approved by the Court at the October 7, 2020 status conference.

judgments satisfied will relieve the docket of the Court of Common Pleas of Philadelphia County,

Pennsylvania.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his

undersigned counsel, respectfully requests this Honorable Court to grant the motion and lift the

Litigation Injunction on a limited basis as set forth above. A proposed order for the Court's

consideration is attached as Exhibit 2.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with all counsel of record and unrepresented parties

in this matter regarding the relief sought through this motion and certifies that counsel of record

and the unrepresented party have either (1) not responded to the Receiver with their position on

the requested relief, or otherwise (2) confirmed that they either do not oppose or take no position

with respect to the relief sought. The SEC takes no position on the motion to lift the litigation

injunction. Its position on the underlying transaction was not solicited and therefore none was

provided.

Dated: July 14, 2021

Respectfully Submitted,

STUMPHAUZER FOSLID SLOMAN ROSS & KOLAYA, PLLC

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Co-Counsel for Receiver

- 3 -

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By: /s/ Gaetan J. Alfano

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DOUGLAS K. ROSENBLUM Pennsylvania Bar No. 90989 (Admitted Pro Hac Vice) DKR@Pietragallo.com

Co-Counsel for Receiver

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 14, 2021, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya TIMOTHY A. KOLAYA

## **EXHIBIT 1**

# TO RECEIVER, RYAN K. STUMPHAUZER'S FOURTEENTH MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS

	CASE NAME	DOCKET ID NO.
1.	Complete Business Solutions Group, Inc. v. Briar Heights, Inc. and John Definnis	200601626
2.	Complete Business Solutions Group, Inc. v. Endurance Automotive, Inc. and Frederick Svede	200500688
3.	Complete Business Solutions Group, Inc. v. Basic Prototype LLC and Anthony Joseph Sarti	200401018
4.	Complete Business Solutions Group, Inc. v. RCH Construction and Ryan Halsey	200401013
5.	Complete Business Solutions Group, Inc. v. Fat Moose Bar and Grill LLC and Jay Smith	200400669
6.	Complete Business Solutions Group, Inc. v. Legends Auto Ranch LLC and Donald L. Hiatt	200400664
7.	Complete Business Solutions Group, Inc. v. Gate Embroidery NY 2, Inc. and Caroline Tinaz	200400536
8.	Complete Business Solutions Group, Inc. v. David Tim Knight Sole Proprietor and David Tim Knight	200400525
9.	Complete Business Solutions Group, Inc. v. Sven Pro Sound LLC and Isaac Svien	200302907
10.	Complete Business Solutions Group, Inc. v. Purple Bloom School LLC and Kate Tsilosani	200301275
11.	Complete Business Solutions Group, Inc. v. Reverent Media, Inc. and Clayton Daniel Vaughan	200300113
12.	Complete Business Solutions Group, Inc. v. Open Sky, Inc. and Jacob Lamdan	200203392
13.	Complete Business Solutions Group, Inc. v. AA and E Hauling LLC and Alvedin Buljubasic and Dzevada Buljubasic	200202915
14.	Complete Business Solutions Group, Inc. v. Elis Flooring LLC and Menachem Eliezer Rabenstein	200202530
15.	Complete Business Solutions Group, Inc. v. Pro Lone Pumping Corp and Nicolas Barcia	200202290
16.	Complete Business Solutions Group, Inc. v. Ma Ga Ne Corporation and Kab Rak Ma	200202283
17.	Contract Financing Solutions, Inc. v. Springs Medical Associates, Inc. and Francis F. Joseph	200200613
18.	Complete Business Solutions Group, Inc. v. Wolf Trans, Inc. and Samet Haliloglu	200200478
19.	Complete Business Solutions Group, Inc. v. Robotic Assistance Devices, Inc. and Steven Reinharz	200200083

	CASE NAME	DOCKET ID NO.
20.	Contract Financing Solutions, Inc. v. Alyria Healthcare LLC and Cynthia M. Kirkwood	200103813
21.	Complete Business Solutions Group, Inc. v. Hoot the Dog LLC and Robert Handley and Jay Franklin Thomas III	200103380
22.	Complete Business Solutions Group, Inc. v. All in One Beauty, Inc. and Alejandro Delgado and Nubia Irene Delgado Hershey	200102545
23.	Complete Business Solutions Group, Inc. v. Otoniel Lisboa Sole Proprietor and Otoniel Lisboa	200101737
24.	Complete Business Solutions Group, Inc. v. The AC Ductologist LLC and Thomas Mouradian	200101508
25.	Complete Business Solutions Group, Inc. v. Vicious Cycle, Inc. and Raschel Barton and George Pethoud	200100046
26.	Complete Business Solutions Group, Inc. v. Valiant Property Solutions LLC and James Miller	191204234
27.	Complete Business Solutions Group, Inc. v. CC Heavy Equpment, Inc. and Carl Cornthwaite	191203611
28.	Complete Business Solutions Group, Inc. v. Villa Chardonnay Horses With Wings, Inc. and Monika Kerber Perez	191203342
29.	Complete Business Solutions Group, Inc. v. Oswald Consulting LLC and Patrick Oswald	191203324
30.	Complete Business Solutions Group, Inc. v. Total Plant Management Group, Inc. and Meherun Nessa Ahmed	191203051
31.	Complete Business Solutions Group, Inc. v. J Michael Rogers DDS LLP and John Michael Rogers	191202720
32.	Complete Business Solutions Group, Inc. v. Cyclone Cup LLC and Ronald O. Hauge	191202564
33.	Contract Financing Solutions, Inc. v. Acullance Holdings, Inc. and Adam Rahman	191202423
34.	Complete Business Solutions Group, Inc. v. Rodney S. Rath Sole Proprietor and Rodney S. Rath	191200669
35.	Complete Business Solutions Group, Inc. v. AG Holdings LLC and Andrew Carol George	191200241
36.	Complete Business Solutions Group, Inc. v. Hermann Harris LLC and Herman Harris	191200175
37.	Complete Business Solutions Group, Inc. v. Performance Fencing LLC and Carl Bruce Hooper	191103423
38.	Complete Business Solutions Group, Inc. v. Landsdown Corporation and Vincenzo LaBarbera	191103291
39.	Complete Business Solutions Group, Inc. v. Slopoke Trucking LLC and Ronnie D. Funk	191103288
40.	Complete Business Solutions Group, Inc. v. Roepnack Corporation and Branford N. Smith	191102770

	CASE NAME	DOCKET ID NO.
41.	Complete Business Solutions Group, Inc. v. Americas #1 TC Services LLC	
	and Israel Reyes and Billy Joe Gonzalez	191102488
42.	Complete Business Solutions Group, Inc. v. Cori-Josh Bingham	191102175
43.	Complete Business Solutions Group, Inc. v. National Transport LLC and	
	Samantha Jones	191102152
44.	Complete Business Solutions Group, Inc. v. Blue Canary Services LLC and	
	Bruce Mesnekoff	191102049
45.	Complete Business Solutions Group, Inc. v. Alexis Welding Express Corp	
	and Alexis Cepero Lima	191101891
46.	Complete Business Solutions Group, Inc. v. Wasatch Back Cleaning	
	Company LLC and Daniel Max Sluga	191101766
47.	Complete Business Solutions Group, Inc. v. Greenlight, Inc. and Shloime	
	Green	191100890
48.	Complete Business Solutions Group, Inc. v. Delfinos Pizza Brixx & Barley,	
	Inc. and Delfino Valderrama-Rodriguez	191100887
49.	Complete Business Solutions Group, Inc. v. Oregon Valley Family Farms	
	LLC and Jessica Parker	191100883
50.	Complete Business Solutions Group, Inc. v. All Color Screen Printing, Inc.	
	and David Lane	191100801
51.	Complete Business Solutions Group, Inc. v. Lawson Adventure Park and	
	Resport LLC and Gregory Brooks	191100663
52.	Complete Business Solutions Group, Inc. v. Gates Enterprises, Inc. v. Joe L.	
	Gates Jr.	191100195
53.	Complete Business Solutions Group, Inc. v. Valley Maintenance LLC and	404002020
	Jason Weatherholtz	191003959
54.	Complete Business Solutions Group, Inc. v. Grimaldi Candy Company LLC	101000056
	d/b/a Vernon Frazier Jr. and Patricia Frazier	191003856
55.	Complete Business Solutions Group, Inc. v. Markesha Jackson Sole	101002502
<i>5.</i> (	Proprietor and Markesha Jackson	191003502
56.	Complete Business Solutions Group, Inc. v. PMPA PLLC and Christine	101002400
57	Vidouria  Consulta Dusiness Salutions Crown Inc. v. Sames Food Compand Samen	191003499
57.	Complete Business Solutions Group, Inc. v. Samco Food Corp and Samer Abdelhamid	101002210
50		191003319
58.	Complete Business Solutions Group, Inc. v. Expo Construction Group LLC	191003079
59.	Complete Business Solutions Group, Inc. v. Starnes Outdoor Solutions, Inc. and Dustin Starnes	101002059
60	Complete Business Solutions Group, Inc. v. SJ Hauling LLC and Justin	191003058
60.	Studer Solutions Group, Inc. v. SJ Hauling LLC and Justin	101002060
61.	Fast Advanced Funding LLC v. Khepra Anu Sole Proprietor and Khepra	191002868
01.	Anu Anu	191002783
62.	Complete Business Solutions Group, Inc. v. Kids R Kids LLC and Sonja	191002/03
02.	Barone	191002781
L	Durone	1/1002/01

	CASE NAME	DOCKET ID NO.
63.	Complete Business Solutions Group, Inc. v. Scott A. Vandermoere Sole Proprietor and Scott A. Vandersoere	191002771
64.	Complete Business Solutions Group, Inc. v. Corfu 77 Corp and Socrates Sellas	191002730
65.	Complete Business Solutions Group, Inc. v. Reflexion of Perfection LLC and Jonathan Mazzolla	191002726
66.	Contract Financing Solutions, Inc. v. Phoenix Energy Fulfillment, Inc. and Jason Troy Nicholson	191002287
67.	Complete Business Solutions Group, Inc. v. Pro Surveillance LLC and Eric Pohl	191001719
68.	Complete Business Solutions Group, Inc. v. Rochester Endovascular PLLC and Ian J. Wilson	191000254
69.	Complete Business Solutions Group, Inc. v. Glamstation, Inc. and Eduardo Baez	191000253
70.	Complete Business Solutions Group, Inc. v. Hop 2 It Dump Truck Service LLC and Joel Poke III	191000204
71.	Complete Business Solutions Group, Inc. v. Pink Poodle Grooming NB LLC and Diana Gonzales	191000033
72.	Complete Business Solutions Group, Inc. v. Basic Equine Health LLC and Thomas Hall	190903784
73.	Complete Business Solutions Group, Inc. v. Brenis, Inc. and Evangelina Santiago De Brenis	190903761
74.	Complete Business Solutions Group, Inc. v. Price is Right Construction LLC and Garrett Price	190903514
75.	Complete Business Solutions Group, Inc. v. RRV Trucking, Inc. and Reynaldo Rodriguez	190903437
76.	Complete Business Solutions Group, Inc. v. Black Sheep Holding LLC and Jessamyn Vasquez	190903250
77.	Complete Business Solutions Group, Inc. v. Funtime LLC and Julie Caricato	190903216
78.	Complete Business Solutions Group, Inc. v. Sarah McKee and Carl Curry LP and Carl Curry and Sarah McKee	190903008
79.	Complete Business Solutions Group, Inc. v. DA George and Sons Construction, Inc. and David Allen George and Barbara Lynn George	190903002
80.	Complete Business Solutions Group, Inc. v. Galeto Brazilian Grill, Inc. and Eli Nascimento	190902757
81.	Complete Business Solutions Group, Inc. v. Putney Transportation LLC and Andrew Brown	190902595
82.	Complete Business Solutions Group, Inc. v. G and T Entertainment, Inc. and Tiffany Le and George Quach	190902528
83.	Complete Business Soluttions Group, Inc. v. S.L.I.R. Automotive LLC and Cheryl Matthews	190902179

	CASE NAME	DOCKET ID NO.
84.	Complete Business Solutions Group, Inc. v. Kris Halvorson Sole Proprietor and Kris Halvorson	190902175
85.	Complete Business Solutions Group, Inc. v. Tammy's Place LLC and Kenneth Carroll	190901895
86.	Complete Business Solutions Group, Inc. v. New Dominion Capital Funding LLC and William Dederick	190901611
87.	Complete Business Solutions Group, Inc. v. Laveen Total Eyecare LLC and Torrance Watkins	190901271
88.	Complete Business Solutions Group, Inc. v. Marlene and Orlandos Distribution LLC and Orlando Colon and Marlene Colon	190901236
89.	Complete Business Solutions Group, Inc. v. ATL Freedom Club, Inc. and Ahmad Rateb Shukoor	190900763
90.	Complete Business Solutions Group, Inc. v. Healthy Pets Enterprise LLC and Scott Jackelen	190900688
91.	Complete Business Solutions Group, Inc. v. Savage Fitness LLC and Christina Aguillon	190900388
92.	Complete Business Solutions Group, Inc. v. R D Haberstroh Jr. Insurance, Inc. and Richard Haberstroh	190804519
93.	Complete Business Solutions Group, Inc. v. Serenity Tax and Bookkeeping Services LLC and Dennelle Lea Lorenzi	190804500
94.	Complete Business Solutions Group, Inc. v. Bichos Wireless LLC and Angelica Garcia	190803430
95.	Complete Business Solutions Group, Inc. v. MXP Fit LLC and Branko Boricich and Samuel Zagorac	190803307
96.	Complete Business Solutions Group, Inc. v. Sector 5, Inc. and Peter Michaels	190803303
97.	Complete Business Solutions Group, Inc. v. Ameen General Contractors, Inc. and Richard Smith	190802805
98.	Complete Business Solutions Group, Inc. v. Engineers of Tomorrow LLC and Zaneta D. Vance and Alshaheed Saladin Muhammad	190802748
99.	Complete Business Solutions Group, Inc. v. Diamond Realty, Inc.	190801475
100.	Complete Business Solutions Group, Inc. v. Kenneth L. Gross Sole Proprietor	190801472
101.	Complete Business Solutions Group, Inc. v. JLM Expediting and Filing Services, Inc.	190801449
102.	Complete Business Solutions Group, Inc. v. Alquest Technologies, Inc. and Henry Wojcik	190801354
103.	Complete Business Solutions Group, Inc. v. Team Cavalier LLC and Charles Edward Williams	190800945
104.	Complete Business Solutions Group, Inc. v. Juan Antonio Flores Sole Proprietor	190800589
105.	Complete Business Solutions Group, Inc. v. Pure Love Elderly Care, Inc. and Samantha Joy Lizen Escobar	190705036

	CASE NAME	DOCKET ID NO.
106.	Complete Business Solutions Group, Inc. v. Albareda & Associates PA and	
	Adelaida Albareda	190705035
107.	Complete Business Solutions Group, Inc. v. Red Wood Inn, Inc. and Liqing	
100	Lin	190704709
108.	Complete Business Solutions Group, Inc. v. Bio Soil Enhancers, Inc. and Louis H. Well and Nolan W. Wade	190704153
109.	Complete Business Solutions Group, Inc. v. B.P.N. Management LLC and	150701122
	Nathan Nordstrom	190704011
110.	Complete Business Solutions Group, Inc. v. Bulldog Auto and Detailing	
	and Gram Short	190703989
111.	Complete Business Solutions Group, Inc. v. Ronald Britt Sole Proprietor	
	and Ronald Britt	190703692
112.	Complete Business Solutions Group, Inc. v. Green Earth Solutions USA	
110	Electric, Inc. and Kevin Whitmire and Gairy Williams	190702336
113.	Complete Business Solutions Group, Inc. v. Copper Cricket Enterprise LLC	100702221
114	and Thomas H. Cole	190702331
114.	Complete Business Solutions Group, Inc. v. Golden Ohm Beer LLC and Brent D. Shiner	190701288
115.	Complete Business Solutions Group, Inc. v. Coit Tool Company, Inc. and	190/01200
113.	Russell Bliss	190701017
116.	Complete Business Solutions Group, Inc. v. Tellez Trucking, Inc. and	
	Antonio Tellez	190700849
117.	Complete Business Solutions Group, Inc. v. KC Tax Services LLC and	
	Kiara Cooper-Hicks	190700585
118.	Complete Business Solutions Group, Inc. v. Concept Tool and Gage	
110	Incorporated and Denise Townsend	190700553
119.	Complete Business Solutions Group, Inc. v. Chaka International	100700267
120	Distribution LLC and David O. Addai	190700367
120.	Complete Business Solutions Group, Inc. v. Rapid Response Asset Management Group LLC and Jonathan Schmier	190700012
121.	Complete Business Solutions Group, Inc. v. Elizabeth Williams Gonzales	190700012
141.	Sole Proprietor and Elizabeth Williams Gonzales	190607307
122.	Fast Advanced Funding LLC v. Koolmex and Christopher Patterson	190607337
123.	Complete Business Solutions Group, Inc. v. Doctors Choice 1 LLC and	17000/132
	Ruth Ann Abernathy	190607129
124.	Complete Business Solutions Group, Inc. v. LI Center LLC and Franklin	
	Garcia Felix	190606821
125.	Complete Business Solutions Group, Inc. v. Three S Electric, Inc. and	
	Suzanne Lynch	190606812
126.	Complete Business Solutions Group, Inc. v. Air Utrec and Certuria Dowdy	190606806
127.	Complete Business Solutions Group, Inc. v. The Black Room LLC and	
	Franz Pass	190606572

	CASE NAME	DOCKET
120	CASE NAME	ID NO.
128.	Complete Business Solutions Group, Inc. v. Calculated Commodities LLC and Moises Flores	190606079
129.	Complete Business Solutions Group, Inc. v. The Fortius Holding Group,	
	Inc. and Philip A. Capolongo	190606072
130.	Complete Business Solutions Group, Inc. v. Form Fit Packaging LLC and	
	Vanessa Chapman	190501772
131.	Complete Business Solutions Group, Inc. v. Absalute Powerstroke Diesel	
	LLC and John Scheel and Iris Scheel	190501529
132.	Complete Business Solutions Group, Inc. v. Daniel Phu Cosmetics, Inc. and	
	Daniel Dinh	190501253
133.	Complete Business Solutions Group, Inc. v. Matthew Cates Sole Proprietor	
	and Matthew Cates	190500954
134.	Complete Business Solutions Group, Inc. v. Goodwin Bros Maintenance	
	and Construction, Inc. and Kenneth Goodwin	190500953
135.	Complete Business Solutions Group, Inc. v. B4 Fitness LLC and Rebecca	
	Pouliot	190500511
136.	Complete Business Solutions Group, Inc. v. Prosperity Technology LLC	
	and Jesse Aranda	190500096
137.	Complete Business Solutions Group, Inc. v. Travis Loy Sole Prorietor and	
	Travis Loy	190404495
138.	Complete Business Solutions Group, Inc. v. Chapala Authentic Mexican	
	Restaurant and Grill 2 LLC and Jose Ramon Valencia	190403884
139.	Complete Business Solutions Group, Inc. v. Runnin L Farms LLC and	
	Donald B. Lindsey	190402105
140.	Complete Business Solutions Group, Inc. v. All Brevard Electrical Service,	
	Inc. and Thomas Tucker	190303679
141.	Complete Business Solutions Group, Inc. v. Tender Heart Quality Care	
	Services LLC and Appolonia Okonkwo	190303428
142.	Complete Business Solutions Group, Inc. v. Zhongyue Machining Co. LTD	
	and Douglas R. Smith	190302989
143.	Complete Business Solutions Group, Inc. v. Horizon Health Center, Inc.	
	and Arlene Simon	190301008
144.	Complete Business Solutions Group, Inc. v. K & W Sterling, Inc. and	
	Kendra Roxana Sterling	180105084

#### **EXHIBIT 2**

### UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA 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.	

### [PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER'S FOURTEENTH MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS

THIS CAUSE comes before the Court upon the Receiver's Fourteenth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings [ECF No. \_\_\_] ("Motion"), filed on July 14, 2021.

In the Motion, the Receiver seeks to modify the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141], so as to lift the litigation injunction provided for in that Order for certain garnishment matters currently pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, for the limited purpose of allowing the Receiver, in his discretion, to mark confessed judgments satisfied, where the obligation underlying the confessed judgments had been satisfied prior to the entry of the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141].

The Receiver has made a sufficient and proper showing in support of the relief requested.

Accordingly, it is hereby

**ORDERED AND ADJUDGED** that Receiver's Motion is **GRANTED** with respect to the relief requested in the Motion. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] is hereby lifted in the matters identified in Exhibit 1 to the Motion in the Court of Common Pleas of Philadelphia County, Pennsylvania, and solely for the purpose as described in the Motion.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_\_ day of \_\_\_\_\_\_, 2021.

RODOLFO A. RUIZ II UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record