

UNITED STATES DISTRICT COURT
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.

/

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY TO DEFENDANTS'
JOINT RESPONSE TO THE MOTION TO STRIKE AFFIRMATIVE DEFENSES**

Undersigned counsel erred in the calendaring of the Reply date, for 14 days rather than 7 days from the date of the Response. There is no explanation other than human error, and undersigned is responsible for it as the lead trial attorney for the Commission on this case.

Undersigned apologizes for this error. The Commission asks that it be given until August 4, 2021 to file its Reply. The Defendants are taking the Commission's Rule 30(b)(6) deposition on August 2 (tomorrow), and the Commission had planned to finalize the Reply draft after the conclusion of this deposition and will not be able to finalize it before then because the deposition is expected to last seven hours.

This Motion is not filed for purposes of delay, and will not affect the trial date or other deadlines in this case. Undersigned apologizes for the error that gave rise to asking the Court to expend resources to address this Motion.

Dated: August 2, 2021

Respectfully submitted,

By: s/Amie Riggle Berlin
Amie Riggle Berlin
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CERTIFICATE OF SERVICE

Undersigned conferred with Counsel via email upon realizing the error this evening when reading the Receiver' status update of today's date that references the July 20 Response date. Counsel for Defendant Joseph LaForte does not oppose the enlargement of time; counsel has received responses from other defense counsel or pro se Defendant Michael Furman.

By: s/Amie Riggle Berlin

CERTIFICATE OF SERVICE

This motion was served on defense counsel via cm-ecf and on pro se defendant Michael Furman via email this same day, August 2, 2021. By: s/Amie Riggle Berlin

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

Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFF'S
MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY TO DEFENDANTS'
JOINT RESPONSE TO THE MOTION TO STRIKE AFFIRMATIVE DEFENSES**

THIS CAUSE comes before the Court upon Plaintiff Securities and Exchange Commission's Motion for Enlargement of Time to File a Reply to Defendants' Joint Response to the Motion to Strike Affirmative Defenses [ECF No. ___] (the "Motion").

Having reviewed the Motion and being otherwise duly advised, it is hereby

ORDERED AND ADJUDGED that the Emergency Motion to Seal is **GRANTED**.

The SEC shall file its Reply on or before August 4, 2021.

DONE AND ORDERED in Fort Lauderdale, Florida, this _____ day of August , 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record