

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 REPLY  
TO THE SECURITIES AND EXCHANGE COMMISSION'S RESPONSE TO  
DEFENDANT'S MOTION TO DISCHARGE THE RECEIVER**

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 two-day extension of time to file their Reply to the Securities and Exchange Commission’s (“Commission”) Response to Defendants’ Motion to Discharge the Receiver (DE 662). In support thereof, Defendants state as follows:

1. On July 13, 2021, Defendants filed their Motion to Discharge the Receiver and Incorporated Memorandum of Law (DE 649).
2. On July 28, 2021, the Commission filed its Response to Defendants’ Motion to Discharge the Receiver (DE 662).
3. As such, Defendants’ Reply to the Commission’s Response are due August 4, 2021.
4. Defendants request a two-day extension of time to file their Reply on or before August 6, 2021.
5. The request is made in good faith and not for any improper purpose. The

requested extension will not prejudice any party.

6. Undersigned counsel has conferred with counsel for the Commission, Amie Berlin, 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 Reply to the Commission's Response to Defendants' Motion to Discharge the Receiver through and including August 6, 2021.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 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.

ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE REPLY TO THE SECURITIES AND EXCHANGE COMMISSION'S  
RESPONSES TO DEFENDANT'S MOTION TO DISCHARGE THE RECEIVER

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 their Reply to the Securities and Exchange Commission's Response to Defendants' Motion to Discharge the Receiver. Being fully advised, it is hereby:

**ORDERED AND ADJUDGED** that Defendants' Motion is **GRANTED**. Defendants shall file their Reply to the Securities and Exchange Commission's Response to Defendants' Motion to Discharge the Receiver on or before August 6, 2021.

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

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HONORABLE RODOLFO A. RUIZ II  
UNITED STATES DISTRICT JUDGE

Copies furnished to: All Counsel of Record