UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 20-CIV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

DEFENDANT'S MOTION TO FILE MATERIALS UNDER SEAL IN SUPPORT OF RESPONSE TO RECEIVER'S QUARTERLY STATUS REPORT

Pursuant to Local Rule 5.4, Defendants Joseph W. LaForte, Lisa McElhone, and Joseph Cole Barleta, by and through their attorneys, respectfully seek to file under seal documents that have been designated as Confidential pursuant to the Protective Order.

1. Good cause exists because the documents have been designated confidential pursuant to the Protective Order (DE# 437).

2. Exhibit F is crucial to Defendant's response but was designated Protective Order entered by this Court. (DE 437).

3. Therefore, Defendant respectfully requests that Exhibit F be filed under seal.

Wherefore, Defendants respectfully request that they be permitted to file exhibit F under seal.

Dated: August 6, 2021

KOPELOWITZ OSTROW FERGUSON WEISELBERG GILBERT

One W. Las Olas Blvd., Suite 500 Fort Lauderdale, Florida 33301 Attorneys for Joseph W. LaForte

By: /s/ David L. Ferguson

DAVID L. FERGUSON Florida Bar Number: 0981737 Ferguson@kolawyers.com JOSHUA R. LEVINE Florida Bar Number: 91807 Levine@kolawyers.com

LAW OFFICES OF ALAN S. FUTERFAS

565 Fifth Avenue, 7th Floor New York, New York 10017

<u>/s/ Alan S. Futerfas</u>

ALAN S. FUTERFAS Telephone: 212- 684-8400 asfuterfas@futerfaslaw.com Attorneys for Lisa McElhone Admitted Pro Hac Vice

<u>/s/ Bettina Schein</u> Bettina Schein, Esq. Attorney for Joseph Cole Barleta 565 Fifth Avenue, New York, New York 10017 (212) 880-9417 bschein@bettinascheinlaw.com Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 6, 2021, I electronically filed the forgoing 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 transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ David L. Ferguson DAVID L. FERGUSON