

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

