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.

MOTION TO WITHDRAW AS COUNSEL FOR LISA MCELHONE

Michael F. Bachner, Esq., respectfully moves to withdraw as counsel for Defendant Lisa McElhone. In support of this request, Mr. Bachner states as follows:

- 1. Ms. McElhone is presently represented by Alan Futerfas, Esq. I was retained to work with Mr. Futerfas. Ms. McElhone is no longer requires my services in the case.
- 2. In accordance with Local Rule 11.1(d)(3), I have notified Ms. McElhone both orally and via email of my intention to withdraw as counsel. I have also notified the SEC and co-counsel of my intention to withdraw as counsel. The address of co-counsel for Ms. McElhone appears below.

WHEREFORE, Michael Bachner, Esq., respectfully requests entry of an Order granting his motion to withdraw as counsel for Lisa McElhone. A proposed Order has been attached for Your Honor's convenience.

Dated: August 13, 2021 Respectfully Submitted,

Michael F. Bachner, Esq. Attorney for Lisa McElhone 39 Broadway, Suite 1610 New York, New York 10006 (212) 344-7778 (office) (212) 344-7774 (fax) (917) 225-9276 (mobile) mb@bhlawfirm.com (email)

By: /s/ Michael Bachner
MICHAEL BACHNER
ADMITTED PRO HAC VICE

ALAN FUTERFAS, Esq. Attorney for Lisa McElhone 565 Fifth Avenue New York, NY 10017

GRAYROBINSON, P.A. Local Counsel for Lisa McElhone 333 S.E. 2d Avenue, Suite 3200 Miami, Florida 33131 Telephone: (305) 416-6880 Facsimile: (305) 416-6887 joel.hirschhorn@gray-robinson.com

By: /s/ Joel Hirschhorn
JOEL HIRSCHORN, ESQ
Florida Bar No. 104573

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this this 13th day of 2021, the foregoing Motion to Withdraw as Counsel for Lisa was served in accordance with the Federal Rules of Civil Procedure and/or the Local Rules of the United States District Court for the Southern District of Florida upon the attorneys for the Plaintiff in the above-entitled action by electronic mail with hard copies made available by mail upon request.

/s/ Michael F. Bachner
MICHAEL F. BACHNER

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Defendants.

ORDER GRANTING MOTION BY MICHAEL F. BACHNER, ESQ., TO
WITHDRAW AS COUNSEL FOR
LISA MCELHONE

Upon due consideration, the motion by Michael F. Bachner, Esq., to be relieved as counsel for Defendant Lisa McElhone, is hereby **GRANTED.**

DONE AND ORDERED at Miami, Florida on August , 2021

RODOLFO A. RUIZ II

USDCJ