

IN THE UNITED STATES DISTRICT COURT  
FOR THE 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.

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**DEFENDANTS' UNOPPOSED MOTION FOR ADDITIONAL PAGES**

Defendants, Joseph W. LaForte, Lisa McElhone, and Joseph Cole Barleta, by and through undersigned counsel hereby request to exceed the page limit by 5 pages to the Reply in Support to Defendants' Motion to Dismiss the Amended Complaint Due to Misconduct by the Securities and Exchange Commission and Related Constitutional Violations [D.E.663].

1. The SEC sought and received an additional ten pages to file its response to Defendants' motion.

2. Accordingly, the Defendants request an additional 5 pages to properly respond to all of the SEC's arguments in the response.

3. Defense counsel conferred with Amie Berlin, counsel for Plaintiff, and she does not oppose this Motion and agrees with the relief requested herein.

Dated: August 17, 2021.

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on August 17, 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