

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 9:20-cv-81205-RAR**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

/

**DEFENDANTS LISA MCELHONE AND JOSEPH COLE BARLETA'S
UNOPPOSED MOTION FOR AN EXTENSION OF ONE DAY**

Defendants Lisa McElhone and Joseph Cole Barleta (“Defendants”), by and through undersigned counsel, respectfully file this Unopposed Motion for an extension of one day to file their Amended Answers. In support thereof, Defendants state as follows:

1. The Court’s Order Granting in Part and Denying in Part Plaintiff’s Motion to Construe Some Affirmative Defenses as Denials, and to Strike Others (ECF 690), directed the Defendants to file their Amended Answers on August 20, 2021.
2. Due to travel and another matter, undersigned counsel for McElhone and Cole were not able to review the final draft of the Amended Answers until today. Counsel for the SEC does not oppose the one day extension of time to file these Amended Answers to August 21, 2021.
3. The Amended Answers are filed with this motion.
4. The request is made in good faith and not for any improper purpose. The requested leave will not prejudice any party.

5. Undersigned counsel has contacted counsel for the Securities and Exchange Commission, Amie Berlin, with respect to this Motion, who advised the Commission has **no objection** to the relief requested herein.

WHEREFORE, Defendants Lisa McElhone and Joseph Cole Barleta, respectfully request this Court to enter an order granting defendants an extension of one day to file their Amended Answers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of August, 2021, a true and correct copy of the foregoing Answer and Affirmative Defenses was served via the Court's CM/ECF System upon all counsel of record.

/s/ JOEL HIRSCHHORN
Joel Hirschhorn