

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 20-CV-81205-REINHART**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

**PLAINTIFF'S MOTION TO FILE SUMMARY JUDGMENT
MOTION AND EXHIBITS UNDER SEAL**

Plaintiff Securities and Exchange Commission respectfully moves to file under seal its Motion for Summary Judgment because it discusses and attaches as exhibits evidence the Receiver has designated as Confidential. The issue was just raised by Receiver's counsel in a telephone call after 11pm on the filing deadline after the Defendants filed documents on the public docket with their Motion. The SEC does not oppose those exhibits being immediately sealed since they contain merchant, bank, and financial information that has been designated Confidential by the Receiver.

The SEC respectfully asks that it be permitted to file its Motion under seal. The Motion includes portions that describe Confidential documents and some of the exhibits are Confidential documents. The SEC will not be re-filing TRO Motion exhibits that are already on the docket and cited in the summary judgment, and therefore the number of exhibits filed with the Motion for Summary Judgment is not significant. However, it does include exhibits that cannot be filed or described on the public docket.

The Receiver's counsel agrees with the relief sought herein for the reasons discussed above.

WHEREFORE the Commission respectfully request the Honorable Court to grant the Motion to Seal and to seal and to permit the SEC to file its Motion for Summary Judgment and exhibits under seal.

October 4, 2021

Respectfully submitted,

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