

**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.,**

JOINT MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL STIPULATION

Plaintiff Securities and Exchange Commission and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, Perry Abonizio, and Michael Furman jointly file this motion for an extension of time to file the joint pre-trial stipulation and accompanying proposed jury instructions from October 22, 2021 until November 5, 2021. In support the parties state:

The Court's Amended Order Setting Jury Trial, Schedule, Requiring Mediation, And Referring Certain Matters To Magistrate Judge of March 30, 2021 (DE 521), requires the parties to file the joint pre-trial stipulation on or before October 22, 2021. All seven parties met and conferred via WebEx video call on Thursday, October 14, 2021 to discuss both the substance of parts of the stipulation as well as the logistics of coordinating the stipulation. And while the parties have had their substantive differences, on this particular issue everyone understood the importance of working together on this type of joint document. In discussing the mechanics, the parties unanimously agreed that to make sure they meet all the requirements of the stipulation and provide the Court with all the information it needs in a stipulation, we would need the additional time.

In particular, the parties require the extra time to exchange exhibit lists as well as to

coordinate the electronic exchange of exhibits in enough time for the other parties to review them, determine what objections they may have, provide those objections to all the other parties, and then provide all of that information to all other parties for filing. With seven parties, the mechanics of accomplishing those tasks will take additional time. Because of the number of parties, we all also anticipate needing additional time to finalize proposed jury instructions in the format required by the Court, as well as confer on the issues of fact and law that we may agree on and which issues will remain for trial.

In addition, extending the deadline for filing the stipulation will allow the parties to first complete summary judgment briefing, which may affect the content of the stipulation. As a result, the parties submit that good cause exists for an extension of time until November 5, 2021, to file the joint pre-trial stipulation. A proposed order is attached.

October 15, 2021

Respectfully submitted,

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**ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME
TO FILE JOINT PRE-TRIAL STIPULATION**

THIS MATTER came before the Court upon the Joint Motion for Extension of Time to File Joint Pre-Trial Stipulation by Plaintiff Securities and Exchange Commission, and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, Perry Abbonizio, and Michael Furman. After reviewing the motion and the record, and otherwise being duly advised:

IT IS ORDERED AND ADJUDGED that the Motion **IS GRANTED**. The parties shall have until Friday, November 5, 2021 to file the Joint Pre-Trial Stipulation.

DONE and ORDERED in Fort Lauderdale, Florida, this ____ day of October 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to; Counsel of Record