

**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.,**

/

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

Today the Court granted the Defendants' motion for an extension of time to respond to the Securities and Exchange Commission's Motion for Partial Summary Judgment. The Court has granted the Defendants an enlargement of time to file their Response briefs on or before October 26, 2021. The reasons the Defendants cite in their motion apply equally if not more so to the SEC. The Defendants raise myriad issues in their Motion for Summary Judgment, and the SEC requires time to adequately address them. Unlike the SEC Motion, which is supported primarily by evidence filed at the onset of this case, the Defendants' Motion largely relies on evidence not utilized - and in some instances not produced - until now. Further, many of the issues raised in the Defendants' Motion overlap with those raised in the SEC's Motion for Partial Summary Judgment, therefore making a parallel briefing schedule a reasonable means for addressing them.

This Motion is not filed for purposes of delay and will not impact the trial schedule. Instead, it would grant the SEC the same relief the Court has granted the Defendants and would create a parallel briefing schedule for summary judgment.

WHEREFORE Plaintiff requests an extension of time until October 26, 2021 to file its response to the motion.

CERTIFICATE OF CONFERRAL

SEC counsel emailed defense counsel to confer about the relief sought herein, counsel for Defendants Furman, Barleta and LaForte has no objection, and counsel did not receive a response from counsel for the other Defendants by the time of filing. Since the SEC's response is currently due Monday, October 18, the SEC did not want to delay in seeking relief.

October 15, 2021

Respectfully submitted,

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**ORDER GRANTING MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE**

THIS MATTER came before the Court upon the Plaintiffs Motion for Extension of Time to File Response and the Court, after reviewing the Motion and otherwise being duly advised,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. The S.E.C. shall have until October 26, 2021 to file its response to the Motion for Partial Summary Judgment.

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