

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.*,

Defendants.

**DEFENDANTS' UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO
REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION IN *LIMINE* TO
EXCLUDE EXPERT TESTIMONY AND REPORT OF MELISSA DAVIS**

Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta move pursuant to Fed. R. Civ. P. 6(b) for a two-day extension of time, until October 28, 2021, to reply to Plaintiff Securities and Exchange Commission's Response to Motion to Exclude Expert Testimony and Report of Melissa Davis (DE 843). In support, Defendants state as follows:

1. On October 04, 2021, Defendants filed a Motion in *Limine* to Exclude Expert Testimony and Report of Melissa Davis (DE 803). Plaintiff filed its Response on October 19, 2021 (DE 843).¹ The reply is due on October 26, 2021 ("Reply"). Defendants' Response to Plaintiff's Motion for Partial Summary Judgment (DE 817) is also due on the same day.

2. Defendants seek a short extension of time to thoroughly address the arguments made in Docket Entry 843. Defendants have conferred with Plaintiff's counsel, who does not oppose the relief requested in this motion.

¹ Plaintiff initially filed their response on October 18, 2021. However, the docketing clerk required Plaintiff to file a notice of striking and then refile the document to correct issues with Plaintiff's signature block. *See* DE 837.

3. This motion is brought in good faith, will not affect other deadlines in this case, and no party will be prejudiced by the granting of the relief requested herein.

WHEREFORE, Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta respectfully request that this Court enter an Order extending the deadline to file their Reply to Docket Entry 843 to October 28, 2021.

CERIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I hereby certify that the undersigned has conferred with Plaintiffs' counsel and represents that Plaintiff does not oppose the relief requested in the Motion.

Dated: October 25, 2021

Respectfully submitted,

FRIDMAN FELS & SOTO, PLLC
2525 Ponce de Leon Boulevard, Suite 750
Coral Gables, FL 33134
Telephone: 305-569-7701
asoto@ffslawfirm.com
Attorneys for Joseph W. LaForte

/s/ Alejandro O. Soto
ALEJANDRO O, SOTO, ESQ
Florida Bar No. 172847

**KOPELOWITZ OSTROW
FERGUSON WEISELBERG GILBERT**
One W. Las Olas Blvd., Suite 500
Fort Lauderdale, Florida 33301
Attorneys for Joseph W. LaForte

/s/ David L. Ferguson
DAVID L. FERGUSON
Florida Bar Number: 0981737
Ferguson@kolawyers.com
JOSHUA R. LEVINE
Florida Bar Number: 91807
Levine@kolawyers.com

LAW OFFICES OF ALAN S. FUTERFAS

565 Fifth Avenue, 7th Floor
New York, New York 10017
Telephone: 212-684-8400
asfuterfas@futerfaslaw.com
Attorneys for Lisa McElhone

/s/ Alan S. Futerfas

ALAN S. FUTERFAS, ESQ.
Admitted Pro Hac Vice

LAW OFFICES OF BETTINA SCHEIN

565 Fifth Avenue, 7th Floor
New York, New York 10017
Telephone: 212-880-9417
bschein@bettinascheinlaw.com
Attorneys for Joseph Cole Barleta

/s/ Bettina Schein

BETTINA SCHEIN, ESQ.
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record via the Court's CM/ECF Filing Portal on this 25th day of October, 2021.

/s/ Alejandro O. Soto

ALEJANDRO O, SOTO, ESQ

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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Defendants.

**[Proposed] ORDER GRANTING DEFENDANTS' UNOPPOSED JOINT MOTION FOR
EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE TO MOTION IN
LIMINE TO EXCLUDE EXPERT TESTIMONY AND REPORT OF MELISSA DAVIS**

THIS CAUSE came before the Court on Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta's (collectively, "Defendants") Unopposed Joint Motion for Extension of Time ("Motion") to file a Reply to Plaintiff's Response to Defendants' Motion in *Limine* to Exclude Expert Testimony and Report of Melissa Davis (DE 843). The Court having reviewed the Motion and being otherwise fully advised in the premises, it is hereby:

ORDER AND ADJUDGED that the Unopposed Motion is hereby GRANTED. Defendants shall have up to and including October 28, 2021 to file their Reply to Plaintiff's Response to Defendants' Motion in *Limine* to Exclude Expert Testimony and Report of Melissa Davis (DE 843).

DONE AND ORDERED in Chambers in the United States District Court, Southern District of Florida, this ___ day of October, 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record via ECF