

**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 BY DEFENDANTS JOSEPH LAFORTE, LISA MCELHONE, JOSEPH
COLE BARLETA, DEAN VAGNOZZI, PERRY S. ABBONIZIO AND PLAINTIFF
SECURITIES AND EXCHANGE COMMISSION TO FILE RESPONSES TO
SUMMARY JUDGMENT MOTIONS ON OCTOBER 28, WHEN DEFENDANT
FURMAN'S RESPONSE IS DUE**

Plaintiff Securities and Exchange Commission and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, Perry S. Abbonizio respectfully ask the Court to file summary judgment responses on the same day Defendant Michael Furman's Response is due - October 28 [ECF No 858].

This motion is not filed for purposes of delay and will not effect the date the motions are ripe because the Court ordered the SEC to file one Reply brief to the responses, with a deadline running from the date of Furman's filing. The parties all require the additional time to complete the response briefs due, and the brief 48-hour enlargement of time will allow for that.

WHEREFORE the parties jointly request a 48-hour extension of time until October 28, 2021 to file their response to the summary judgment motions.

October 26, 2021

Respectfully submitted,

Amie Riggle Berlin
Senior Trial Counsel

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/

**ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSES TO MOTIONS FOR PARTIAL SUMMARY JUDGMENT**

THIS MATTER came before the Court upon the Joint Motion for Extension of Time to File Responses to Motions for Partial Summary Judgment and the Court, after reviewing the Motion and otherwise being duly advised,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. The Parties. shall have until October 28, 2021 to file their response to the Motions 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