UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Case No. 20-CIV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

JOINT MOTION FOR ADDITIONAL PAGES

Defendants, Joseph W. LaForte, Lisa McElhone, and Joseph Cole Barleta, and the Securities and Exchange Commission, by and through undersigned counsel hereby request to exceed the page limit under Rule 56.1 by 7 pages for their Responses to each other's Statement of Undisputed Facts [D.E. 816 & 823].

1. Due to the number of parties in this case and the fact that these Defendants and the SEC are both drafting consolidated responses, the Parties request an additional 7 pages to properly respond to all of the factual allegations.

Dated: October 28, 2021.

By: /s/ Joshua Levine DAVID L. FERGUSON Florida Bar Number: 0981737 Ferguson@kolawyers.com JOSHUA R. LEVINE Florida Bar Number: 91807 Levine@kolawyers.com **KOPELOWITZ OSTROW FERGUSON WEISELBERG GILBERT** One W. Las Olas Blvd., Suite 500 Fort Lauderdale, Florida 33301 Attorneys for Joseph W. LaForte

By: /s/Amie Riggle Berlin Amie Riggle Berlin, Esq. Senior Trial Counsel Florida Bar No. 630020 Direct Dial: (305) 982-6322 Direct email: berlina@sec.gov Attorney for Plaintiff SECURITIES AND EXCHANGE COMMISSION 801 Brickell Avenue, Suite 1800 Miami, Florida 33131 Telephone: (305) 982-6300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 28, 2021, I electronically filed the forgoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Joshua R. Levine JOSHUA R. LEVINE