

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 EXTEND TIME TO FILE  
MOTION IN LIMINE**

Plaintiff Securities and Exchange Commission and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, and Perry S. Abbonizio respectfully ask the Court for a two-day extension to file their respective Motions in *Limine* or until November 4, 2021.

This motion is not filed for purposes of delay. The parties have not yet exchanged exhibit lists and are working on resolving issues, to the extent they can, prior to filing the motions in *limine*. The parties all require the additional time to complete this process, and the brief 48-hour enlargement of time will allow for that.

WHEREFORE the parties jointly request a 48-hour extension of time until November 4, 2021 to file their respective motions in *limine*.

November 2, 2021

Respectfully submitted,

s/Alise Johnson  
Alise Johnson  
Senior Trial Counsel  
Florida Bar No. 0003270

Direct Dial: (305) 982-6322  
Email: [johnsonali@sec.gov](mailto:johnsonali@sec.gov)

Attorneys for Plaintiff  
**SECURITIES AND EXCHANGE  
COMMISSION**  
801 Brickell Avenue, Suite 1950  
Miami, Florida 33131  
(305) 982-6300

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**ORDER EXTENDING TIME TO FILE MOTION IN LIMINE**

**THIS MATTER** came before the Court upon the Joint Motion to Extend Time to File Motion in *Limine* by Plaintiff Securities and Exchange Commission and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, and Perry S. Abbonizio. After reviewing the Motion and otherwise being duly advised,

**IT IS HEREBY ORDERED** that the Motion **IS GRANTED**. Plaintiff Securities and Exchange Commission, and Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, and Perry S. Abbonizio shall have until Thursday, November 4, 2021 to file their respective motions in *limine*.

**DONE and ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_ day of November 2021.

\_\_\_\_\_  
RODOLFO A. RUIZ II  
UNITED STATES DISTRICT JUDGE

Copies to; Counsel of Record