

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.

**JOINT MOTION BY DEFENDANTS JOSEPH LAFORTE, LISA MCELHONE, JOSEPH
COLE BARLETA, DEAN VAGNOZZI, PERRY ABBONIZIO, MICHAEL FURMAN,
AND PLAINTIFF SECURITIES AND EXCHANGE COMMISSION TO EXTEND TIME
TO FILE JOINT PRETRIAL STIPULATION AND OTHER DEADLINES**

Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, Perry Abbonizio, Michael Furman, and Plaintiff Securities and Exchange Commission respectfully ask the Court for a brief extension to file the Joint Pretrial Stipulation, and their respective Motions in Limine and Replies in Support of Motions for Partial Summary Judgment.

This motion is not filed for purposes of delay. The parties have been working diligently to prepare the Joint Pretrial Stipulation and have already exchanged a draft and exchanged witness and exhibits lists and trial exhibits. The parties' efforts have been delayed given their participation in recent settlement discussions with Magistrate Judge Reinhart. In addition, a defense attorney recently suffered a personal loss which has caused the attorney to be unavailable this week. Consequently, the parties all require additional time and the brief extensions requested will allow for that.

WHEREFORE the parties jointly request a three-day extension of time to file the Joint Pretrial Stipulation until Wednesday, November 10, 2021, and a four-day extension of time to file their respective Motions in Limine and Replies in Support of their Motions for Partial Summary Judgment until Wednesday, November 10, 2021.

Respectfully submitted,

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/

**ORDER EXTENDING TIME TO FILE JOINT PRETRIAL STIPULATION,
MOTIONS IN LIMINE AND REPLIES IN SUPPORT OF MOTIONS
FOR PARTIAL SUMMARY JUDGMENT**

THIS MATTER came before the Court upon the Joint Motion to Extend Time to File Pretrial Stipulation, Motions in Limine and Replies in Support of the parties' Motions for Partial Summary Judgment by Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, Dean Vagnozzi, Perry Abbonizio, Michael Furman, and Plaintiff Securities and Exchange Commission. After reviewing the Joint 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, Perry Abbonizio and Michael Furman shall have until Wednesday, November 10, 2021 to file the Joint Pretrial Stipulation and their respective Motions in Limine and Replies in Support of their Motions for Partial Summary Judgment.

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