

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 MOTION TO FILE EXHIBIT "C" TO
DE 893-4 UNDER SEAL IN SUPPORT OF THEIR RESPONSE TO
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Local Rule 5.4, Defendants Joseph W. LaForte, Lisa McElhone, and Joseph Cole Barleta, by and through their undersigned counsel, respectfully move unopposed to file under seal Exhibit "C" to the Declaration of Joseph Cole Barleta (DE 893-4). Exhibit C is a compilation of executed Note Purchase Agreements. Good cause exists because the Receiver, Ryan K. Stumphauzer, has designated the Note Purchase Agreements as "CONFIDENTIAL" pursuant to the Protective Order in this case (DE 437). Accordingly, the Note Purchase Agreements should not be available on the public docket.¹

¹ The Note Purchase Agreements were transmitted to the SEC on November 4, 2021 as part of Defendants' trial exhibit list. The undersigned identified the specific documents in the exhibit list that comprise Exhibit C in a separate email to the SEC on November 8, 2021.

WHEREFORE, Defendants respectfully request permission to file Exhibit "C" to DE 893-4 under seal in support of their Response to Plaintiff's Motion for Partial Summary Judgment (DE 893).

Dated: November 9, 2021

Respectfully submitted,

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LOCAL RULE 7.1(A)(3) CERTIFICATION

The undersigned counsel has conferred with counsel for the Securities and Exchange Commission regarding this motion and is authorized to represent that counsel for the Commission does not oppose this motion. While the Commission does not oppose the relief requested herein, it does oppose the Defendants' request to file the documents in support of their Response to Plaintiff's Motion for Partial Summary Judgment.

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 9th day of November 2021.

/s/ Alejandro O. Soto

ALEJANDRO O. SOTO, ESQ

UNITED STATES DISTRICT COURT
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SECURITIES AND EXCHANGE MMISSION,

Plaintiff,

v.

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

Defendants.

**[PROPOSED] ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION
TO FILE EXHIBIT "C" TO DE 893-4 UNDER SEAL IN SUPPORT OF THEIR
RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

THIS CAUSE came before the Court on Defendants Joseph W. LaForte, Lisa McElhone, and Joseph Cole Barleta's Unopposed Motion to File Exhibit "C" to DE 893-4 Under Seal ("Unopposed Motion") in support of their Response to Plaintiff's Motion for Partial Summary Judgment (DE 893). 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**. The Court hereby seals Exhibit "C" to DE 893-4 in support of their Response to Plaintiff's Motion for Partial Summary Judgment (DE 893) and instructs the Clerk to restrict public access to Exhibit "C" to DE 893-4.

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

THE HONORABLE RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record via ECF