

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 THE JOINT PRETRIAL STIPULATION AND OTHER DEADLINES BY ONE
DAY**

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, of one day, to file the Joint Pretrial Stipulation, the Jury Instructions and all parties Replies in Support of Motions for Summary Judgment.

This motion is not filed for purposes of delay. The parties have been working diligently together to prepare the Joint Pretrial Stipulation, the Jury Instructions, and to exchange Witness Lists and Trial Exhibits, as well as to draft their briefs for the Motions *in Limine* and the Reply briefs for the Motions for Summary Judgment. The Parties have also been in settlement discussions with Magistrate Judge Reinhart, which have been time consuming. Consequently, the parties all require additional time.

WHEREFORE the parties jointly request a one-day extension of time to file the Joint Pretrial Stipulation, their Jury Instructions and the and Replies in Support of their Motions for Summary Judgment until Thursday, November 11, 2021.

November 10, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served on all counsel of record via electronic mail this 10h day of November, 2021.

/s/ Joshua R. Levine
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