

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 FOR A ONE DAY EXTENSION OF TIME TO
FILE THE JOINT PRETRIAL STIPULATION, JURY INSTRUCTIONS, VERDICT
FORMS, EXHIBIT LISTS, AND WITNESS LISTS**

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, jury instructions, verdict forms, exhibit lists and witness lists.

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 Reply briefs for the Motions for Summary Judgement. The Parties have also been in settlement discussions with Magistrate Judge Reinhart. On Friday, November 12, the Defendants sent drafts of documents to the SEC. The SEC returned redlined drafts today and this evening. The parties need one more day to review and finalize the drafts before filing them. Consequently, the parties all require one additional day.

WHEREFORE, the parties jointly request a one-day extension of time to file the Joint Pretrial Stipulation, jury instructions, verdict forms, exhibit lists and witness lists until Tuesday, November 16, 2021 at 5:00 PM.

November 15, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 15, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Joel Hirschhorn
JOEL HIRSCHHORN