

**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.,**

/

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION AND DEFENDANTS’
JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO MOTIONS
IN LIMINE**

Plaintiff Securities and Exchange Commission and Defendants Lisa McElhone, Joseph LaForte, Dean Vagnozzi, Joseph Cole Barleta, Perry Abbonizio and Michael Furman (collectively “the Parties) respectfully request an enlargement of time until Monday, November 29, 2021, to file their respective responses to the pending Motions in Limine. The SEC is currently drafting a unified response to three separate motions in limine filed by Defendants¹, and the Defendants are working on their respective responses to the SEC’s omnibus motion in limine. Concurrent with drafting these responses, the Parties have been engaged in extensive and time consuming settlement discussions and other trial preparation. Thus, the Parties request a short extension to file their responses to the respective motions in limine. The enlargement of time will not affect the trial date or any Court deadlines and is not sought for purposes of delay.

WHEREFORE the Parties respectfully request an enlargement of time to file their respective responses to the Motions in Limine.

¹ The SEC and Mr. Abbonizio have reached a settlement of the issues regarding liability and therefore a fourth motion in limine, filed by Mr. Abbonizio (DE 924) may be deemed moot.

November 23, 2021

Respectfully submitted,

s/**Alise Johnson**

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**SECURITIES AND EXCHANGE
COMMISSION**

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**ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO MOTIONS IN LIMINE**

THIS MATTER came before the Court upon the Joint Motion for Extension of Time to File Responses to Motions in Limine and the Court, after reviewing the Motion and otherwise being duly advised,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. The Parties shall have until November 29, 2021 to file their responses to the 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