

**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.,**

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**DEFENDANT'S UNOPPOSED MOTION TO BRING ELECTRONIC DEVICES  
INTO THE COURTHOUSE FOR TRIAL**

Defendant, Michael Furman hereby requests permission for himself, undersigned counsel, Zachary P. Hyman, counsel, Yirmi Knight, Elroy John, Matthew Rosenfield, Nicholas Battaglia, and paralegal Jessica Lopez, to bring electronic devices into the Courthouse for use at trial which is on the two week trial calendar starting December 6, 2021. Specifically, this request includes undersigned counsel and Yirmi Knight, Elroy John, David Ferguson, Nicholas Battaglia, Matthew Rosenfeld, and paralegal Jessica Lopez bringing personal and office cellular phones, and laptops, and other equipment to assist at trial.

Undersigned counsel has conferred with opposing counsel, who does not oppose this request.

WHEREFORE Defendant Michael Furman respectfully requests that the Court enter an Order: (i) Granting the Motion; (ii) Allowing Furman to Amend his request for admissions; and (iii) Granting such further relief as the Court deems just and proper.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)**

I HEREBY CERTIFY that counsel for the Movant has conferred with all parties or non-parties who may be affected by the relief sought in this Motion in a good faith effort to resolve the issue and Plaintiff does not consent to the relief sought.

Respectfully Submitted,

**MILLENNIAL LAW, INC.**

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By: *s/ Zachary P. Hyman*

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*Attorneys for Defendant, Michael C. Furman*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1st day of December, 2021, the foregoing was filed using the Court's CM/ECF system which will send notice of electronic filing to all counsel of record.

By: *s/ Zachary P. Hyman*

Zachary P. Hyman