

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,

and

THE LME 2017 FAMILY TRUST, a/k/a

LME 2017 FAMILY TRUST,

Relief Defendant.

_____ /

DEFENDANT, MICHAEL C. FURMAN'S, MOTION IN LIMINE

Defendant, Michael C. Furman ("*Furman*"), by and through the undersigned counsel, hereby files the foregoing proposed voir dire questions:

1. Do you or any of your family members work for a government agency?
2. Have you ever hired an attorney, financial advisor, accountant, stockbroker, financial planner, or appraiser?
3. If so, what was your experience like?
4. Have you ever held a professional license?
5. If so, what license or licenses did you hold?
6. And what is current status of that license or licenses?
7. Have you ever owned or operated your own business?
8. If so, did you have a partner?

9. And what kind of business was it?
10. Are you familiar with the merchant cash advance industry, factoring, or the asset based lending industry?
11. If so, how did you become familiar with it?
12. Have you ever taken out a pay day loan, mortgage, or auto loan?
13. Have you ever been involved in a lawsuit, foreclosure, or bankruptcy?
14. Have you ever been the subject of a collection action or subject to collection efforts by a debt collector?
15. Have you ever invested in bitcoin, dodgecoin, NFTs or other crypto currency?
16. What do you rely on to keep track of current events?

Respectfully submitted,

MILLENNIAL LAW, INC.

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Attorneys for Defendant, Michael C. Furman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **3rd** 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