UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Case No.: 9:20-CV-81205

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

COMPLETE BUSINESS SOLUTIONS GROUP, INC. d/b/a/ PAR FUNDING, LISA MCELHONE, *et al.*,

Defendants, and

L.M.E. FAMILY TRUST,

Relief Defendant.

MOTION TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION, AND REQUEST TO <u>ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING</u>

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Deputy Attorney General Evan A. Showell of the New Jersey Division of Law, 124 Halsey Street, 2nd Floor, Newark, New Jersey 07101 (Telephone No.: 973-648-4878), for purposes of appearance as counsel on behalf of non-party witness, **STEPHEN BOUCHARD**, the designated representative of the New Jersey Bureau of Securities, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Deputy Attorney General Evan A. Showell to receive electronic filings in this case, and in support thereof states as follows:

1. Deputy Attorney General Showell is not admitted to practice in the Southern District of Florida, but is a member in good standing and admitted to practice in the State of New Jersey,

the District of New Jersey, the Southern District of New York, the Eastern District of New York, and the U.S. Court of Appeals for the Third Circuit.

2. Movant, Alise Johnson, Senior Trial Attorney for the United States Securities and Exchange Commission, Miami Regional Office, 801 Brickell Avenue, Suite 1950, Miami, Florida 33131 (Telephone No.: 786-626-7399), is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, the New Jersey Office of the Attorney General, by whom Deputy Attorney General Showell is employed, will make payment of this Court's admission fee simultaneously with the filing of this Motion.

4. Deputy Attorney General Showell, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to him at the following email address: evan.showell@law.njoag.gov.

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WHEREFORE, Alise Johnson, moves this Court to enter an Order permitting Deputy Attorney General Evan A. Showell to appear before this Court on behalf of non-party witness STEPHEN BOUCHARD, Director of Examinations of the New Jersey Bureau of Securities, to represent Stephen Bouchard in his official capacity in connection with his anticipated trial testimony in the above-styled matter and directing the Clerk to provide notice of electronic filings to Deputy Attorney General Showell.

Respectfully submitted,

Alise Johnson Sr. Trial Counsel U.S. Securities & Exchange. Commission Miami Regional Office 801 Brickell Ave. Suite 1950 Miami, Florida 33131 Telephone # 786-626-7399 johnsonali@sec.gov By: /s/Alise Johnson ALISE JOHNSON Florida Bar #0003270

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 6, 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/Alise Johnson ALISE JOHNSON

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Case No.: 9:20-CV-81205

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Defendants, and

L.M.F. FAMILY TRUST,

Relief Defendant.

CERTIFICATION OF DEPUTY ATTORNEY GENERAL EVAN A. SHOWELL

Deputy Attorney General Evan A. Showell, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing and admitted to the practice in the State of New Jersey, the District of New Jersey, the Southern District of New York, the Eastern District of New York, and the U. S. Court of Appeals for the Third Circuit; (3) I have not filed three or more motions for *pro hac vice* admission in this District within the last 365 days.

By:

". Showel

Evan A Showell Deputy Attorney General New Jersey Division of Law 124 Halsey Street, 2nd Floor Newark, New Jersey 07101 (973) 648-4878 Evan.showell@law.njoag.gov

Dated: December 6, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 6, 2021 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/Alise Johnson ALISE JOHNSON

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Case No.: 9:20-CV-81205

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Relief Defendant.

ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION AND REQUEST TO <u>ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING</u>

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* for Deputy Attorney General Evan A. Showell, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the Motion and all other relevant

factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Deputy Attorney General Evan A. Showell, may appear and participate in this action on behalf of non-party witness Stephen Bouchard, Director of Examinations of the New Jersey Bureau of Securities. The Clerk shall provide electronic notification of all electronic filings to Deputy Attorney General Showell, at evan.showell@law.njoag.gov.

DONE AND ORDERED in Chambers at Miami, Florida, this _____ day of December, 2021.

United States District Judge

Copies furnished to: All Counsel of Record