

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, UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE REPLY**

Defendant, Michael C. Furman ("*Furman*"), by and through the undersigned counsel, hereby requests that the Court enter an order extending the time for him to file a Reply in Support of his Motion for a New Trial, and in support thereof states:

1. On or January 12, 2022, Furman filed his Motion for New Trial [ECF No. 1129] (the "*Motion*").
2. Thereafter, Plaintiff filed its *Opposition to Michael Furman's Motion for New Trial* [ECF No. 1146] on or about February 9, 2022 (the "*Response*"). As a result, the deadline for Furman to file a Reply in Support of the foregoing Motion is February 16, 2022.
3. Due to the undersigned's schedule and the complexity of the matters raised in the Motion and Response, Furman needs an additional fourteen days to file a Reply in Support of the Motion.

4. As a result, Furman requests that he be provided up to and until March 3, 2022, to file a Reply in Support of the Motion.

5. Counsel for Plaintiff has consented to the relief sought.

WHEREFORE, Defendant, Michael C. Furman, respectfully requests that the Court enter an Order: (i) Granting the Motion and (ii) 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 have been advised that there is no objection to the relief requested herein.

Respectfully submitted,

MILLENNIAL LAW, INC.

Attorneys for Michael C. Furman

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By: *s/ Zachary P. Hyman* _____

Zachary P. Hyman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **15th** day of February, 2022, 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

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SECURITIES AND EXCHANGE COMMISSION,

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Defendants.

_____ /

**ORDER GRANTING UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY**

THIS CAUSE comes before the Court upon *Defendant, Michael C. Furman's, Unopposed Motion for Extension of Time to File Reply* [ECF No. ___] (the "**Motion**"), and the court having reviewed the Motion, having been advised of no objection to the relief being requested, and being otherwise duly advised, it is hereby:

ORDERED AND ADJUDGED as follows:

1. The Motion is **GRANTED**.
2. Defendant, Michael C. Furman, shall have through and including Thursday, March 3, 2022, to file a Reply to Plaintiff's Response in Opposition to Michael Furman's Motion for New Trial.

DONE AND ORDERED in Fort Lauderdale, Florida this ___ day of February, 2022.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: all counsel of record