

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, SECOND 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. Furman was also granted another extension up through and until March 3, 2022.

3. Due to the undersigned's schedule and the complexity of the matters raised in the Motion and Response, Furman needs an additional seven days to file a Reply in Support of the Motion. Furman also intends to use this time to secure a copy of the transcript of the proceedings.

4. As a result, Furman requests that he be provided up to and until March 11, 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
501 E. Las Olas Blvd Ste 200/308
Fort Lauderdale Fl 33301
Phone: 954-271-2719

By: *s/ Zachary P. Hyman*

Zachary P. Hyman
Florida Bar No. 98581
zach@millenniallaw.com
millenniallawforms@gmail.com
jessica@millenniallaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March, 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