

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

**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.

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**DANIEL SCARAMELLINO, ONE NINE COUNTRY DRIVE, LLC. AND MICHELLE  
SCARAMELLINO'S UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSE IN OPPOSITION TO RECEIVER'S EXPEDITED MOTION TO  
EXPAND RECEIVERSHIP [ECF NO. 1180]**

Interested Parties, Daniel Scaramellino, 19 Country Drive, LLC. and Michelle Scaramellino (collectively, "Responding Parties"), through their undersigned counsel, hereby jointly file this unopposed Motion for Extension of Time to File Response to *Receiver, Ryan K. Stumphauzer's Expedited Motion to Expand the Receivership to Include 19 Country Drive, Morristown, NJ 07960 [ECF No. 1180]* (the "Expedited Motion"), and states as follows:

1. The Receiver and the Responding Parties had reached an agreement in principle to an escrow procedure regarding the proceeds of the sale of the New Jersey Property, with the intent of providing the parties a 30 day opportunity to attempt reach a settlement regarding the Motion to Expedite. The Respondents worked for hours on attempting to reach the agreement, however, due to information learned by Receiver's counsel at about 11:45 p.m. or so on March 24, 2022, Receiver's counsel indicated that the Receiver needs to discuss the issues further and determine how to proceed.

2. As a result, the Responding Parties require a 7 day extension of their response deadline. This will provide time to see whether the agreement in principle can be salvaged or to otherwise finalize their response.
3. In view of the circumstances, the Receiver has no objection to the foregoing 7 day extension.
4. If the preliminary agreement cannot be salvaged Responding Parties oppose the Expedited Motion on numerous grounds, including due process and jurisdiction, and would request an evidentiary hearing and a right to full discovery.

Dated: March 24, 2022

Respectfully submitted,

/s/ James D. Silver  
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Counsel for 19 Country Drive, LLC and  
Michelle Scaramellino

*and*

/s/ Katie Brinson Hinton  
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*Attorney for Daniel Scaramellino*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 24, 2022, a true and correct copy of the foregoing was filed with the Clerk of the Court using CM/ECF.

*/s/Katie Brinson Hinton*  
Katie Brinson Hinton