

**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.

**PLAINTIFF’S UNOPPOSED MOTION FOR PAGE ENLARGEMENT AND FOR
THREE-DAY EXTENSION OF TIME TO FILE MOTION FOR FINAL JUDGMENTS**

Plaintiff Securities and Exchange Commission moves for a three day extension of time, until Friday, April 15, 2022, to file the motion for Final Judgments against Defendants Lisa McElhone, Joseph LaForte, Joseph Cole Barleta and Michael Furman (“Motion”), and for leave to file a Motion that is up to 50 pages in length, for the reasons set forth below.

Currently, the SEC’s Motion is due to be filed on Tuesday, April 12, 2022. The SEC requires until Friday, April 15, 2022, due to the process for obtaining authorization from the Commissioners of the SEC to file a Motion seeking the specific disgorgement, prejudgment interest, and civil penalty amounts against each Defendant. This enlargement of time will not affect any deadline in the Court’s scheduling Order, and defense counsel are not objecting to this brief enlargement of time.

The SEC also requires additional pages for its Motion, and seeks leave to file a Motion that is up to 50 pages in length. The Motion is an omnibus motion that seeks relief against four Defendants. For three of the Defendants, the Complaint allegations are deemed true for purposes

of the Motion, pursuant to the Defendants' consent Judgments previously entered by the Court. The Motion also asks the Court to consider additional evidence, addresses two of the Defendants' Fifth Amendment assertions and seeks an adverse inference, and addresses the legal standards for the relief sought within the framework of the Complaint allegations, adverse inferences, and evidence presented in this case. In addition, the Motion addresses relief against a fourth Defendant within a different framework, where the Defendant did not consent to deeming the Complaint allegations as true but was found liable by a jury on every Count of the Complaint following a jury trial. None of the Defendants object to the request for a page enlargement.

WHEREFORE, Plaintiff requests an extension of three days, to file the Motion on Friday, April 15, 2022, and seeks leave to file a Motion not exceeding 50 pages in length.

Certificate of Conferral

Pursuant to Southern District of Florida Local Rule 7.1(a)(3), undersigned counsel conferred with counsel for the Defendants. Counsel for Defendants LaForte, McElhone, and Furma do not object to the relief sought in this Motion. Counsel for Defendant Joseph Cole Barleta takes no position on the relief sought in this Motion.

Respectfully submitted,

s/Amie Riggle Berlin

Amie Riggle Berlin, Esq.
Senior Trial Counsel
Fla. Bar No. 630020
Telephone: (305) 982-6322
Facsimile: (305) 536-4154
E-mail: berlina@sec.gov

ATTORNEY FOR PLAINTIFF
SECURITIES AND EXCHANGE COMMISSION
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Telephone: (305) 982-6300

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**COMPLETE BUSINESS SOLUTIONS GROUP,
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**ORDER GRANTING PLAINTIFF'S UNOPPOSED MOTION
FOR PAGE ENLARGEMENT AND FOR THREE-DAY EXTENSION OF TIME
TO FILE MOTION FOR FINAL JUDGMENTS**

THIS MATTER came before the Court upon Plaintiff's Unopposed Page Enlargement and For Three-Day Extension of Time to File Motion for Final Judgments against the remaining Defendants. After reviewing the Motion and otherwise being duly advised,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. The Securities and Exchange Commission shall the Motion for Final Judgments against Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, and Michael Furman on or before Friday, April 15, 2022, not exceeding 50 pages.

DONE and ORDERED in Fort Lauderdale, Florida, this ____ day of April, 2022.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record