

**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.

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF'S OMNIBUS MOTION FOR FINAL JUDGMENT**

Defendants Lisa McElhone, Joseph W. LaForte, and Joseph Cole Barleta (“Defendants”), by and through their attorneys, respectfully file this Unopposed Motion pursuant to Fed. R. Civ. P. 6(b) for an extension to file their response to Securities and Exchange Commission’s Motion for Final Judgment [D.E. 1214]. In support thereof, Defendants state as follows:

1. On November 24, 2021, this Court granted the SEC’s motions for permanent injunction and entered Judgment of Permanent Injunction and Other Relief against Defendants LaForte and McElhone [D.E. 1007-10].
2. On November 28, 2021, this Court granted the SEC’s motions for permanent injunction and entered Judgment of Permanent Injunction and Other Relief against Defendant Barleta [D.E. 1017-18].
3. These motions were based off of the agreement between the Parties in which the Defendants neither admit nor deny the allegations in the Amended Complaint but are precluded from challenging them for the purpose of the disgorgement hearing.

4. The SEC was originally granted 90 days to file a motion for Disgorgement and other penalties, to wit February 22, 2022, for the motions as to Defendants LaForte and McElhone, [D.E. 1007, 1009], and February 26m 2022 as to Defendant Barleta. [D.E. 1017].
5. The SEC then sought and permission to file a single omnibus motion as to Defendants LaForte, McElhone, Barleta, and Furman, and to have an extension until April 12, 2022 for this omnibus motion. [D.E. 1147-48].
6. The SEC then sought and was granted another extension of three days to file this omnibus motion. [D.E. 1211-12].
7. On April 15, 2022, Plaintiff Securities and Exchange Commission filed an Omnibus Motion for Final Judgment [D.E. 1214].
8. Under the normal 14-day briefing schedule, Defendants' Response is due on April 29, 2022.
9. Defendants request an extension of time to file their Response on or before July 1, 2022.
10. However, due to the nature of this motion, and the fact that the Judgments of Permanent Injunction and Other Relief contemplate the Parties taking discovery, Defendants need additional time to take limited discovery and prepare a proper response to the SEC's motion.
11. The request is made in good faith and not for any improper purpose. The requested extension will not prejudice any party.
12. Undersigned counsel has conferred with counsel for Plaintiff, Amie Berlin, who advised she has no objection to the relief requested.

WHEREFORE, Defendants, Lisa McElhone, Joseph W. LaForte and Joseph Cole Barleta request that this Court enter an order, extending the time to file their Response to the Plaintiff's Motion through and including July 1, 2022.

Dated: April 26, 2021

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 26, 2022, I electronically filed the forgoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ David L. Ferguson
DAVID L. FERGUSON

UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT
OF FLORIDA

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SECURITIES AND EXCHANGE COMMISSION,

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v.

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

Defendants.

**ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF'S OMNIBUS MOTION FOR FINAL JUDGMENT**

THIS CAUSE comes before the Court upon the Defendants, Joseph LaForte, Lisa McElhone and Joseph Cole Barleta's Unopposed Motion for Extension of Time to File a Response to Plaintiff's Omnibus Motion for Final Judgment [D.E. 1214].

Accordingly, it is hereby

ORDERED AND ADJUDGED that Defendants' Motion is **GRANTED**.

The deadline for the Defendants to file their Response to the Plaintiff's Motion is July 1, 2022.

DONE AND ORDERED Fort Lauderdale, Florida, this ____ day of _____, 2022.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record