

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 RESPONSE TO
PLAINTIFF'S OMNIBUS MOTION FOR FINAL JUDGMENT**

Pursuant to the applicable rules of this Court, 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 response to the Plaintiff, Securities and Exchange Commission's ("*Plaintiff*") Omnibus Motion for Final Judgment [ECF No. 1214] (the "*Omnibus Motion*"). In support thereof, Furman states as follows:

1. On December 15, 2021, this Court entered Judgment as to Liability against Furman [ECF No. 1103].
2. The Plaintiff was originally granted 90 days to file a Motion for Disgorgement and other penalties, to wit March 15, 2022, for a motion as to Furman.

3. The Plaintiff then sought permission to file a single omnibus motion as to Defendants Joseph W. LaForte, Lisa McElhone, Joseph Cole Barleta, and Furman, and to have an extension until April 12, 2022 for this omnibus motion. [ECF No. 1147-48].

4. The Plaintiff then sought and was granted another extension of three days to file this omnibus motion. [ECF No. 1211-12].

5. On April 15, 2022, Plaintiff filed its Omnibus Motion for Final Judgment [ECF No. 1214].

6. Under a normal 14-day briefing schedule, Furman's Response was due on or about April 29, 2022.

7. Furman requests an extension of time to file a response on or before July 1, 2022.

8. Due to the undersigned's schedule and that the complexity of the matters raised in the Motion contemplate the parties taking discovery, Furman needs additional time to take discovery and prepare a proper response to the Plaintiff's Omnibus Motion.

9. This request is being made in good faith and not for the purpose of delay or any other improper purpose. The requested extension will not prejudice any party.

10. 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; (ii) extending the time for Furman to file a Response to the Omnibus Motion through and including July 1, 2022, and (iii) 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.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of May, 2022, the foregoing was filed using the Court's CM/ECF Filing system which will transmit Notices of Electronic Filing generated by CM/ECF 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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v.

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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 *Defendant, Michael C. Furman's, Unopposed Motion for Extension of Time to File Response to Plaintiff's Omnibus Motion for Final Judgment* [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 July 1, 2022, to file a Response to Plaintiff's Omnibus Motion for Final Judgment [ECF No. 1214].

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: all counsel of record