

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 20-CIV-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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**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL  
FOR DEFENDANT JOSEPH LAFORTE**

The undersigned counsel and law firm, Fridman Fels & Soto, PLLC (collectively, “Counsel”) move unopposed to withdraw as counsel for Defendant Joseph LaForte, and state as follows:

1. Mr. LaForte is represented by David L. Ferguson and Joshua Levine of the law firm Kopelowitz Ostrow Ferguson Weiselberg Gilbert, and no longer requires Counsel’s services in the case. The address and contact information for Messrs. Ferguson and Levine, who will remain counsel for Mr. LaForte in this case, are as follows:

Kopelowitz Ostrow Ferguson Weiselberg Gilbert  
One W. Las Olas Blvd., Suite 500  
Fort Lauderdale, FL 33301  
(877) 525-4100  
David L. Ferguson  
[Ferguson@kolawyers.com](mailto:Ferguson@kolawyers.com)  
Joshua R. Levine  
[Levine@kolawyers.com](mailto:Levine@kolawyers.com)

2. Pursuant to Local Rule 11.1(d)(3), Counsel has provided notice of this motion to

withdraw to Mr. LaForte. Counsel for the SEC does not oppose the motion.

WHEREFORE, Fridman Fels & Soto, PLLC and Daniel S. Fridman and Alejandro O. Soto respectfully request the Court to enter an Order granting their unopposed withdrawal as counsel in this case on behalf of Mr. LaForte. The undersigned is submitting a proposed Order to the Court.

Dated: May 13, 2022

Respectfully submitted,

**FRIDMAN FELS & SOTO, PLLC**  
2525 Ponce de Leon Blvd., Suite 750  
Coral Gables, FL 33134  
Telephone: 305 569 7701

**/s/ Alejandro O. Soto**  
Alejandro O. Soto, Esq.  
Florida Bar No. 0172847  
[asoto@ffslawfirm.com](mailto:asoto@ffslawfirm.com)  
Daniel Fridman, Esq.  
Florida Bar No. 176478  
[dfridman@ffslawfirm.com](mailto:dfridman@ffslawfirm.com)

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**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW**

**THIS CAUSE** comes before the Court upon the Unopposed Motion to Withdraw as Counsel for Defendant Joseph LaForte filed by the law firm of Fridman Fels & Soto, PLLC and attorneys Alejandro Soto and Daniel Fridman. Having reviewed the Motion and being otherwise fully advised, it is hereby

**ORDERED AND ADJUDGED** as follows:

1. The Motion is **GRANTED**.
2. Fridman Fels & Soto, PLLC, Alejandro Soto, and Daniel Fridman are hereby withdrawn as counsel and relieved of any further responsibility as counsel for Defendant Joseph LaForte.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_ day of May, 2022.

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RODOLFO A RUIZ II  
UNITED STATES DISTRICT JUDGE