

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.

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**DEFENDANT, MICHAEL C. FURMAN'S, UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFF'S AMENDED 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. 1252] (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. On May 20, 2022, the Plaintiff filed an Amended Omnibus Motion for Final Judgment [ECF NO. 1252], and Furman had up through and until July 1, 2022 to respond to the Amended Motion.

7. Thereafter, Furman sought to take discovery concerning the positions taken by the SEC as to his disgorgement but was denied the opportunity to take any additional discovery.

8. On or about June 29, 2022, Defendants Cole, LaForte and Mcelhone requested and received an enlargement of time, up through and until July 8, 2022, to respond to the Amended Motion. [ECF No. 1282].

9. Furman also requested that he be given the same extension as the other defendants, because, (i) the undersigned was ill; (ii) the undersigned will be travelling out of the country through July 13, 2022; (iii) the undersigned had a trial scheduled on June 29, 2022, that was continued at the last minute; (v) Furman needed time to request discovery from the magistrate; and (v) the other defendants were granted an enlargement of time.

10. However, in response to the Motion, and although it chose to file an Omnibus Motion, the SEC objected to the relief sought. Because of the undersigned's travel schedule, and the SEC has refused to grant the same exact extension as the other defendants, Furman would

request that the Court grant him additional time but does not wish to otherwise disturb any briefing schedule.

11. 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.

12. Counsel for the SEC opposes 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 8, 2022, or at a later time as determined by the Court 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 the SEC objects to the relief requested herein.

Respectfully submitted,

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By: *s/ Zachary P. Hyman*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **29th** day of June, 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