

**UNITED STATES DISTRICT COURT
FOR THE 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.

**RECEIVER, RYAN K. STUMPHAUZER'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE REPLY TO RESPONSES TO EXPEDITED MOTION TO EXPAND
RECEIVERSHIP TO INCLUDE 19 COUNTRY DRIVE, MORRISTOWN, NJ 07960**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities, by and through undersigned counsel, files this Motion for Extension of Time to file his reply to the Response of 19 Country Drive, LLC and Michelle Scaramellino (ECF No. 1290) and the Response of Daniel Scaramellino (ECF No. 1291) (collectively, the “Responses”) to the Receiver’s Expedited Motion to Expand the Receivership to Include 19 Country Drive, Morristown, NJ 07960 (the “Motion to Expand”) (ECF No. 1180), and states:

1. On March 9, 2022, the Receiver filed the Motion to Expand.
2. Through the Motion to Expand, the Receiver requested the Court to expand the receivership over certain property located at 19 Country Drive, Morristown, NJ 07960 (the “Property”).
3. Over the period of the next several months, the Receiver engaged in settlement discussions with 19 Country Drive, LLC, Michelle Scaramellino, and Daniel Scaramellino regarding the Motion to Expand. In addition, the Court granted 19 Country Drive, LLC, Michelle

Scaramellino, and Daniel Scaramellino multiple extensions of time to file their Responses to the Motion to Expand.

4. The parties were unable to resolve the Motion to Expand through these settlement discussions, but did reach agreement on a process through which a sale of the Property was allowed to occur, and the proceeds from the sale of the Property were substituted in place of the Property as the subject of the Motion to Expand.

5. On June 30, 2022, 19 Country Drive, LLC and Michelle Scaramellino filed a Response to the Motion to Expand (ECF No. 1290) and Daniel Scaramellino filed a separate Response to the Motion to Expand (ECF No. 1291).

6. The Receiver is working on preparing a Reply to the Responses to the Motion to Expand. Due to the press of other business, including undersigned counsel's travel out-of-state for meetings on another matter, the Receiver respectfully requests a one-week extension of time, through and including July 14, 2022, for the Receiver to file his Reply.

7. No party will be prejudiced by the brief extension of time, and this Motion is not being pursued for purposes of delay.

8. A proposed Order granting this Motion is attached as Exhibit 1.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant an extension of time, through and including July 14, 2022, for the Receiver to file a Reply to the Responses to the Motion to Expand.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with counsel for 19 Country Drive, LLC, Michelle Scaramellino, and Daniel Scaramellino regarding the relief sought through this motion and

certifies that 19 Country Drive, LLC, Michelle Scaramellino, and Daniel Scaramellino do not oppose this extension of time.

Dated: July 7, 2022

Respectfully Submitted,

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Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 7, 2022, I electronically filed the foregoing 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 transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya

TIMOTHY A. KOLAYA

Exhibit 1

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Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY TO
RESPONSES TO EXPEDITED MOTION TO EXPAND RECEIVERSHIP
ESTATE TO INCLUDE 19 COUNTRY DRIVE, MORRISTOWN, NJ 07960**

THIS CAUSE comes before the Court upon the Receiver's Unopposed Motion for Extension of Time to File Reply to Responses to Expedited Motion to Expand Receivership Estate to Include 19 Country Drive, Morristown, NJ 07960 [ECF No. ____] (the "Motion"), filed on July 7, 2022. The Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

ORDERED AND ADJUDGED that the Motion is **GRANTED**.

1. The Receiver is hereby granted an extension of time, through and including July 14, 2022, within which to file a Reply to the Response of 19 Country Drive, LLC and Michelle Scaramellino (ECF No. 1290) and the Response of Daniel Scaramellino (ECF No. 1291) to the Receiver's Expedited Motion to Expand the Receivership to Include 19 Country Drive, Morristown, NJ 07960 (ECF No. 1180).

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record