

**IN THE 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.

**UNOPPOSED MOTION TO WITHDRAW ADAM M. FOSLID
AS COUNSEL TO THE RECEIVER**

The undersigned, hereby requests that the Court withdraw Adam M. Foslid, Esq. as counsel to Ryan K. Stumphauzer, court-appointed receiver (the “Receiver”) and remove him from the CM/ECF roster in this case. Adam M. Foslid has departed from the law firm of Stumphauzer Foslid Sloman Ross & Kolaya, PLLC. Timothy A. Kolaya, Esq. and Jacqueline Z. DerOvanesian, Esq. of Stumphauzer Foslid Sloman Ross & Kolaya, PLLC and Gaetan J. Alfano, Esq. and Douglas K. Rosenblum, Esq. of Pietragallo Gordon Alfano Bosick & Raspanti, LLP will continue to represent the Receiver in this action. Therefore, the withdrawal of Adam M. Foslid will not cause any delay or interference in the representation of the Receiver.

WHEREFORE, for the foregoing reasons, the undersigned respectfully requests that the Court enter an order permitting Adam M. Foslid to withdraw as counsel and removing him from the CM/ECF roster in this case. A proposed Order granting this Motion is being submitted herewith.

Dated: August 3, 2022

Respectfully submitted,

WINSTON & STRAWN LLP
200 South Biscayne Boulevard, Suite 2400
Miami, FL 33131
Telephone: (305) 910.0500

By: /s/ Adam M. Foslid
Adam M. Foslid
Florida Bar No. 682284
AFoslid@winston.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of August 2022, I electronically filed the foregoing with the Clerk of the Court using CM/ECF.

/s/ Adam M. Foslid
Adam M. Foslid

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Defendants.

[PROPOSED] ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW

THIS CAUSE comes before the Court upon the Unopposed Motion to Withdraw Adam M. Foslid as Counsel to the Receiver [ECF No. ___] (“Motion”). After careful consideration of the Motion and the record in this action, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Motion [ECF No. ___] is **GRANTED**.
2. Adam M. Foslid is hereby withdrawn and relieved of any further responsibility as counsel to Ryan K. Stumphauzer, court-appointed receiver (the “Receiver”). The Clerk is directed to remove Mr. Foslid from the CM/ECF electronic list of counsel to be served in this action.
3. The Receiver will continue to be represented by Timothy A. Kolaya, Esq. and Jacqueline Z. DerOvanesian, Esq. of Stumphauzer Foslid Sloman Ross & Kolaya, PLLC and Gaetan J. Alfano, Esq. and Douglas K. Rosenblum, Esq. of Pietragallo Gordon Alfano Bosick & Raspanti, LLP.

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc. counsel of record