

**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.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR PAGE ENLARGEMENT**

Plaintiff Securities and Exchange Commission respectfully requests a page enlargement for its Reply in support of the Motion for Final Judgment. The Commission will also ask the Court to accept the Reply despite its filing being processed two minutes after the deadline due to difficulties with the filing of an exhibit that is 533 pages in length.

The Reply brief is 32 pages in length. However, it is an omnibus Reply to two separate Response briefs filed by multiple Defendants. The additional pages are necessary to address the myriad arguments made in those two Responses.

Respectfully submitted,

August 3, 2022

By: *s/Amie Riggle Berlin*
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Certificate of Conferral

Undersigned conferred with Defense counsel. Counsel for Defendants Joseph LaForte, Lisa McElhone, and Michael Furman have no objection to the page limit enlargement requested by the Commission. Undersigned did not confer about seeking leave for the two minute enlargement of time because it was unknown at the time of conferral with counsel that there would be filing difficulties. Undersigned will confer with defense counsel to determine if any of them object to the two minute enlargement of time, and will notify the Court if there is any objection so that the issue can be litigated. Undersigned counsel conferred with counsel for Defendant Joseph Cole Barleta about the request for additional pages by sending them an email on August 3, 2022 at 4:09pm, but did not receive a response.

By: s/Amie Riggle Berlin

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_____ /

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PAGE
ENLARGEMENT**

THIS CAUSE comes before the Court upon Plaintiff's Motion for Page Enlargement.

Good cause appearing therefor and the Motion being unopposed, the Court orders as follows:

The Motion is GRANTED. The Commission may file a 32-page Reply brief in support of the Motion for Final Judgment.

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record