

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.

_____ /

**DEFENDANT, MICHAEL C. FURMAN'S, MOTION TO RESCHEDULE
HEARING ON PLAINTIFF'S AMENDED OMNIBUS MOTION
FOR FINAL JUDGMENT AGAINST DEFENDANTS MICHAEL FURMAN,
JOSEPH COLE BARLETA, JOSEPH LAFORTE AND LISA MCELHONE**

Pursuant to the applicable rules of this Court, Defendant, Michael C. Furman ("*Furman*"), by and through the undersigned counsel, hereby requests that the Court reschedule the hearing on Plaintiff, Securities and Exchange Commission's ("*Plaintiff*"), Amended Omnibus Motion for Final Judgments [ECF No. 1252] (the "*Omnibus Motion*") currently scheduled for Wednesday, September 14, 2022, at 10:00 a.m. In support thereof, Furman states as follows:

1. On August 22, 2022, the Court entered an Order scheduling the Omnibus Motion for hearing on Wednesday, September 14, 2022, at 10:00 a.m. [ECF No. 1366].
2. Undersigned counsel currently has a special set hearing which has been set since July in another matter at the same time.

3. Accordingly, Furman requests that the Court reschedule the hearing on the Omnibus Motion for a later time on September 14, 2022, so that undersigned counsel can attend the special set hearing in the other matter and attend the hearing on the Omnibus Motion after.

4. This request is being made in good faith and not for the purpose of delay or any other improper purpose. The requested rescheduling will not prejudice any party.

5. Counsel for Furman has reached out to counsel for all interested parties. Counsel for the Receiver's counsel does not have an objection. Counsel for Defendants LaForte, Cole, and McElhone do not object to the relief sought, but have requested that the Court reschedule the foregoing hearing on a later date, to ensure that there is sufficient time for their arguments to be heard.

6. As of the time of this filing, undersigned counsel has not heard back from the counsel for the SEC.

WHEREFORE, Defendant, Michael C. Furman, respectfully requests that the Court enter an Order: (i) Granting the Motion, (ii) Rescheduling the hearing on the Omnibus Motion to a later time on Wednesday, September 14, 2022 or an alternative date and time that is convenient for the Court, and all other parties in interest; (iv) 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 that counsel for the Receiver does not object to the relief sought, and counsel for Defendants do not object to the relief sought, but have requested that the hearing be conducted at a later date and time.

Respectfully submitted,

MILLENNIAL LAW, INC.

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By: *s/ Zachary P. Hyman* _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **26th** day of August, 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