

**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.

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**RECEIVER, RYAN K. STUMPHAUZER, LISA MCELHONE AND JOSEPH  
LAFORTE’S JOINT MOTION TO PERMIT ELECTRONIC EQUIPMENT IN  
THE COURTROOM FOR CONTEMPT HEARING ON SEPTEMBER 12, 2022**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities, and Defendants Lisa McElhone (“McElhone”) and Joseph LaForte (“LaForte”), by and through respective undersigned counsel, hereby file this Joint Motion to Permit Electronic Equipment for Contempt Hearing on September 12, 2022, and state:

1. On September 12, 2022, at 10:00 a.m., the Court will be conducting an evidentiary hearing (the “Hearing”) on the Receiver’s Motion for an Order to Show Cause Why Defendants Joseph LaForte and Lisa McElhone Should Not Be Held in Contempt [ECF No. 1328] (the “Motion”).

2. Pursuant to the Court’s Policies and Procedures, “[p]arties requiring the use of electronic equipment in a hearing or trial shall file a motion with the Court listing the items needed and the names of the attorneys and/or staff who will be using the equipment.”

3. Ryan K. Stumphauzer, Gaetan J. Alfano, and Timothy A. Kolaya will be present on behalf of the Receiver at the Hearing and intend to use laptop computers and tablets/iPads during the Hearing.

4. Additionally, James M. Kaplan and Noah E. Snyder will be present on behalf of Lisa McElhone and David L. Ferguson will be present on behalf of Joseph LaForte at the Hearing, and also intend to use laptop computers and tablets/iPads during the Hearing.

**WHEREFORE**, the Receiver, Lisa McElhone, and Joseph LaForte respectfully request that the Court enter an Order permitting Ryan K. Stumphauzer, Gaetan J. Alfano, Timothy A. Kolaya, James M. Kaplan, Noah E. Snyder, and David L. Ferguson to bring laptop computers and tablets/iPads into the courtroom and use those electronic devices during the Hearing on the Motion on September 12, 2022, at 10:00 a.m.

**CERTIFICATION REGARDING PRE-FILING CONFERENCE**

The undersigned counsel has conferred with counsel for Defendants Joseph LaForte and Lisa McElhone, who have confirmed that they join in this motion.

Dated: September 11, 2022

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 11, 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