

**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.

**JOINT MOTION OF THE DEFENDANTS LAFORTE, MCELHONE, COLE AND
FURMAN, THE SECURITIES AND EXCHANGE COMMISSION, AND THE RECEIVER,
RYAN K. STUMPHAUZER, TO PERMIT ELECTRONIC EQUIPMENT IN THE
COURTROOM FOR THE DISGORGEMENT HEARING ON SEPTEMBER 14, 2022**

Defendants, Joseph LaForte, Lisa McElhone, Joseph Cole Barletta and Michael C. Furman, the Securities and Exchange Commission (“SEC”), and the Court-Appointed Receiver, Ryan K. Stumphauzer, Esq. (“Receiver”), by and through respective undersigned counsel, hereby file this Joint Motion to Permit Electronic Equipment for the Disgorgement Hearing on September 14, 2022, and state:

1. On September 14, 2022, at 10:00 a.m., the Court will be conducting a hearing (the “Hearing”) on the Securities and Exchange Commission’s Amended Omnibus Motion for final Judgments [ECF No. 1252] (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. At the Hearing, James M. Kaplan, Noah E. Snyder and Alan S. Futerfas will be present on behalf of Lisa McElhone, David L. Ferguson will be present on behalf of Joseph LaForte, Andre G. Raikhelson will be present on behalf of Joseph Cole Barletta, Zachary P. Hyman will be present on behalf of Michael C. Furman, Ryan K. Stumphauzer, and Timothy A. Kolaya will be present on behalf of the Receiver, and Amie R. Berlin will be present on behalf of the SEC. All counsel intend to use laptop computers and tablets/iPads during the Hearing.

WHEREFORE, the Parties respectfully request that the Court enter an Order permitting James M. Kaplan, Noah E. Snyder, Alan S. Futerfas, David L. Ferguson, Andre G. Raikhelson, Zachary P. Hyman, Amie R. Berlin, Ryan K. Stumphauzer, and Timothy A. Kolaya to bring laptop computers and tablets/iPads into the courtroom and use those electronic devices during the Hearing on the Motion on September 14, 2022, at 10:00 a.m.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel have conferred and agreed to file this motion jointly.

Dated: September 13, 2022.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 13th, 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/ James M. Kaplan
JAMES M. KAPLAN