

**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.

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JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS

On September 14, 2022, the Court conducted a hearing on Plaintiff's Omnibus Motion for Final Judgment Against Defendants Furman, Barleta, LaForte and McElhone (the "Omnibus Motion"). At the conclusion of that hearing, the Court advised the parties that it would reserve ruling on the Omnibus Motion to provide them with additional time to discuss potential settlements, and that the parties should file a Joint Status Report with an update on their settlement negotiations on or before September 23, 2022. *See* also Paperless Order, ECF No. 1414).

Since the September 14 hearing, counsel for the parties have engaged in earnest settlement discussions, involving numerous settlement conferences conducted virtually and by phone. The parties were not able to reach a settlement. Mr. Zachary Hyman, on behalf of Defendant Michael Furman, and Andre Raikhelson, on behalf of Cole, agree to this filing.

September 23, 2022

Respectfully submitted,

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