

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-CIV-81205-RAR**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING, *et al.*,

Defendants.

**RECEIVER, RYAN K. STUMPHAUZER’S MOTION FOR EXTENSION
OF TIME TO FILE, AND FOR LEAVE TO EXCEED PAGE LIMITATION ON,
MOTION TO ESTABLISH AND APPROVE: (1) PROOF OF CLAIM FORM; (2)
CLAIMS BAR DATE AND NOTICE PROCEDURES; AND (3) PROCEDURE TO
ADMINISTER AND DETERMINE CLAIMS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities, hereby files this Motion for Extension of Time to File, and for Leave to Exceed Page Limitation on, Motion to Establish and Approve: (1) Proof of Claim Form; (2) Claims Bar Date and Notice Procedures; and (3) Procedure to Administer and Determine Claims (the “Motion”), and states as follows:

1. On November 23, 2022, the Court entered its Interim Scheduling Order Regarding the Claims Administration Process and Order Setting Interim Case Management Conference. (ECF No. 1454). In that Order, the Court, among other things, directed the Receiver to file on or before December 16, 2022, a Motion to Establish and Approve (i) Procedure to Administer and Determine Claims, (ii) Proof of Claim Form, (iii) Claims Bar Date, and (iv) Notice Procedures (the “Motion to Establish Claims Procedures”).

2. The Receiver drafted the Motion to Establish Claims Procedures, including the supporting documents and exhibits, and circulated these drafts to the Securities and Exchange Commission (the “Commission”). To ensure there is sufficient time for the Commission to review these documents, and for the Receiver to consider and incorporate, as appropriate, any of the Commission’s comments to these documents, the Receiver respectfully requests an extension of time, through and including December 21, 2022, to file the Motion to Establish Claims Procedures.

3. Additionally, the Receiver’s current draft of the Motion to Establish Claims Procedures is 25 pages, which exceeds the number of pages permitted under Local Rule 7.1(c)(2). Accordingly, the Receiver respectfully requests leave to exceed the standard 20-page limitation by five pages, for a total of 25 pages, on his anticipated Motion to Establish Claims Procedures.¹

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant the Motion, extend the time for the Receiver to file the Motion to Approve Claims Procedures though and including December 21, 2022, and authorize the Receiver to file a Motion to Approve Claims Procedures that is 25 pages in length. A proposed order for the Court’s consideration is attached as Exhibit 1.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for the Receiver certifies that he has conferred with the Securities and Exchange Commission, which do not oppose the requested relief.

¹ The Receiver acknowledges that Rule 3I(1) of the Court’s CM/ECF Administrative Procedures requires any motion requesting leave to exceed the page limitations to attach the proposed filing to the motion seeking leave. Should the Court wish to review the Motion to Establish Claims Procedures before considering this request, the Receiver will withdraw this portion of the Motion and make this request separately when the final documents are ready to be filed.

Dated: December 16, 2022

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 16, 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

Exhibit 1

**UNITED STATES DISTRICT COURT
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SECURITIES AND EXCHANGE
COMMISSION,

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v.

COMPLETE BUSINESS SOLUTIONS
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Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER'S
MOTION FOR EXTENSION OF TIME TO FILE, AND FOR LEAVE TO EXCEED
PAGE LIMITATION ON, MOTION TO ESTABLISH AND APPROVE: (1) PROOF
OF CLAIM FORM; (2) CLAIMS BAR DATE AND NOTICE PROCEDURES;
AND (3) PROCEDURE TO ADMINISTER AND DETERMINE CLAIMS**

THIS CAUSE comes before the Court upon Receiver, Ryan K. Stumphauzer's ("Receiver") Motion for Extension of Time to File, and for Leave to Exceed Page Limitation on, Motion to Establish and Approve: (1) Proof of Claim Form; (2) Claims Bar Date and Notice Procedures; and (3) Procedure to Administer and Determine Claims (the "Motion") [ECF No. _____].

Having reviewed the Motion and being otherwise duly advised, it is hereby

ORDERED AND ADJUDGED that the Motion is **GRANTED**. The deadline for the Receiver to file the Motion to Establish and Approve: (1) Proof of Claim Form; (2) Claims Bar Date and Notice Procedures; and (3) Procedure to Administer and Determine Claims is extended to Wednesday, December 21, 2022. Further, the Receiver is authorized to file a 25-page Motion to Establish and Approve: (1) Proof of Claim Form; (2) Claims Bar Date and Notice Procedures; and (3) Procedure to Administer and Determine Claims.

DONE AND ORDERED in Fort Lauderdale, Florida, this _____ day of December, 2022.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record