

**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.,**

**/**

**PLAINTIFF'S AGREED MOTION FOR ENLARGEMENT OF TIME TO  
RESPOND TO DEFENDANT JOSEPH COLE BARLETA'S MOTION TO STAY**

Plaintiff Securities and Exchange Commission respectfully requests an enlargement of time, until Monday, January 9, 2023, to respond to Defendant Joseph Cole Barleta's Motion to Stay pending appeal [ECF No. 1460]. In support, the Commission states as follows:

1. Undersigned counsel is lead counsel on this case and is on leave from the Commission until January 3, 2023.
2. Counsel for the Commission spent time prior to the holidays conferring with counsel for various parties on this case in an attempt to resolve outstanding disputes related to the Judgments against Defendants.
3. The enlargement of time is not sought for purposes of delay and will not affect any deadline in this case or any trial, as Final Judgments have been entered.
4. Counsel for Mr. Barleta agrees to the relief requested herein.
5. No Defendant other than Mr. Barleta, whose reply date will change, is affected by the enlargement of time sought in this Motion.
6. The enlargement of time will enable the Commission to fully respond to the Motion for Stay, which Motion seeks relief that would impact the victim investors in this case.

WHEREFORE, the Commission respectfully requests an enlargement of time, until January 9, 2023, to respond to the Motion for Stay pending appeal.

December 27, 2022

Respectfully submitted,

By: s/Amie Riggle Berlin  
Amie Riggle Berlin, Esq.  
Senior Trial Counsel  
Florida Bar No. 630020  
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Attorney for Plaintiff  
**SECURITIES AND EXCHANGE COMMISSION**  
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Telephone: (305) 982-6300  
Facsimile: (305) 536-4154

**CERTIFICATE OF CONFERRAL**

Undersigned counsel spoke with counsel for Defendant Joseph Cole Barleta, who agrees to the relief sought in this Motion.

s/Amie Riggle Berlin  
Amie Riggle Berlin, Esq.

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**[PROPOSED] ORDER GRANTING PLAINTIFF'S AGREED MOTION  
FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT  
JOSEPH COLE BARLETA'S MOTION TO STAY PENDING APPEAL**

THIS CAUSE comes before the Court upon Plaintiff Securities and Exchange Commission's Agreed Motion for Extension of Time to file a Response to Defendant Joseph Cole Barleta's Motion for Stay Pending Appeal [ECF No. \_\_\_\_] (the "Agreed Motion").

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

**ORDERED AND ADJUDGED** that the Agreed Motion is **GRANTED**. The Plaintiff shall have until Monday, January 9, 2023 to file a response to Cole's Motion to Stay [ECF No. 1460].

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_ day of December, 2022.

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**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

Copies to: Counsel of record