

**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.

**JOSEPH LAFORTE AND LISA MCELHONE’S MOTION FOR AN EXTENSION
OF TIME TO FILE A REPLY TO THE SEC’S “NOTICE OF FILING POSITION”**

Defendants, Joseph LaForte and Lisa McElhone (collectively the “Defendants”), by and through their undersigned counsel, respectfully request a 10-day extension of time to file a Reply in Support of their Motion For An Order To Show Cause Why The United State Attorney For The Eastern District of Pennsylvania Should Not Be Held In Contempt (the “Motion for Order to Show Cause”, D.E. 1468), and in support thereof state as follows:

1. After the Defendants filed their Motion for Order to Show Cause, the SEC filed a 7-page brief which it titled “Notice of Filing Position on McElhone and LaForte’s Motion to Hold the U.S. Attorney in Contempt of Court” (the “Notice of Filing Position”, D.E. 1468).
2. The Notice of Filing Position presents arguments regarding the Defendants’ legal standing and other matters raised in the Motion for Order to Show Cause (as well as personal attacks upon the Defendants and their counsel). Accordingly, the Notice of Filing Position constitutes an opposing memorandum of law governed by Local Rule 7.1(c).
3. Recognizing that the Notice of Filing Position is an opposing memorandum of law, the current deadline for the Defendants to file their Reply is December 30, 2022.

4. Defendants respectfully request a 10-day extension of this deadline (through January 9, 2023) due to the press of other deadlines, the intrusion of the holidays, and other circumstances that have delayed the completion of the Defendants' work.

5. Defendants are seeking a 10-day extension of the deadline due to the foregoing circumstances, and not for the purposes of delay.

WHEREFORE, the Defendants Joseph LaForte and Lisa McElhone respectfully request a 10-day extension of time, up to and including January 9, 2023, to file their Reply in Support of their Motion For An Order To Show Cause Why The United State Attorney For The Eastern District of Pennsylvania Should Not Be Held In Contempt.

S.D. Fla L. R. 7.1(a)(3) Certification of Counsel

Counsel for the Defendants hereby certify that they have conferred with counsel for the SEC in a good faith effort to resolve the issues raised in this motion and have been unable to do so.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of December, 2022, I electronically filed the forgoing 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 transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ James M. Kaplan
JAMES M. KAPLAN