

**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.

**DEFENDANTS LISA MCELHONE’S AND JOSEPH LAFORTE’S
MOTION FOR A ONE-DAY ENLARGEMENT OF TIME TO FILE THEIR
OPPOSITION TO THE RECEIVER’S MOTION [ECF NO. 1484]**

Defendants, Lisa McElhone and Joseph LaForte (“Defendants”), by and through their undersigned counsel, hereby file this Motion for a one-day enlargement of time to file an Opposition to the Receiver’s Motion for Order: (1) Authorizing Receiver’s Sale of All Real Property Within the Receivership Estate; and (2) Compelling Lisa McElhone and Joseph LaForte to Vacate and Surrender Haverford Home or, in the Alternative, Pay Obligations for Single-Family Homes (the “Motion”, ECF No. 1484), and as support therefore state as follows:

1. The Receiver filed the Motion on the evening of January 10, 2023, and the Court entered an Order Granting the Receiver’s Motion (the “Order,” ECF No. 1486) in the early morning of January 11, 2023.
2. During the Court’s January 11, 2023 Status Conference, Defendants made an *ore tenus* motion to stay the Order in order to grant them time to file an Opposition to the Motion. The Court granted Defendants’ *ore tenus* motion and ordered them to file their Opposition by January 20, 2023. (See ECF No. 1488).

3. Due to the undersigned counsel's trial schedule and the press of other deadlines, including two unanticipated emergency motions which were filed in a separate case this week, Defendants respectfully request a brief one-day extension of the deadline to file their Opposition to the Motion. If the request is granted, the new deadline will be January 23, 2023.

4. Defendants' counsel conferred with counsel for the Receiver and was advised that the Receiver does not oppose the requested extension.

5. Defendants are seeking the requested extension due to the foregoing circumstances, and not for the purposes of delay. No party will be prejudiced if the extension is granted.

WHEREFORE, Defendants respectfully request an extension of time, up to and including January 23, 2023, to file their Opposition to the Receiver's Motion.

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

Counsel for the Defendant hereby certify that they have conferred with counsel for the Receiver in a good faith effort to resolve the issues raised in this motion and are authorized to state that the Receiver does not oppose the requested extension.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of January, 2023, 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