

**UNITED STATES DISTRICT COURT
FOR THE 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.

_____ /

RECEIVER’S MOTION TO CONTINUE STATUS CONFERENCE ON APRIL 10, 2023

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through his undersigned counsel, files this Motion to Continue Status Conference on April 10, 2023 (the “Motion”). In support thereof, the Receiver states:

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding; Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; MK Corporate Debt Investment Company LLC; Capital Source 2000, Inc.; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consulting, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; 500 Fairmount Avenue, LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, LLC; LWP North LLC; The LME 2017 Family Trust; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and ALB Management, LLC; and the receivership also includes the properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr.,

1. On March 6, 2023, the Court entered an Order setting an in-person status conference in this case for Monday, April 10, 2023. (ECF No. 1520).

2. The purpose of the status conference is for the Receiver and his counsel to provide the Court with an update on the claims administration process, as well as an update regarding collection efforts on behalf of the investors. (*Id.*)

3. Undersigned counsel will be out of the country on April 10, 2023, and returning to Miami on April 13, 2023, and, therefore, would not be able to be present at a status conference on April 10, 2013.

4. Although other counsel for the Receiver can be present at a status conference on April 10, 2013, undersigned counsel for the Receiver has been primarily responsible for providing updates to the Court on the claims administration process.

5. Given that counsel are required to attend this status conference in-person, undersigned counsel respectfully requests that the Court continue this status conference to another date at the Court's discretion on a date after April 13, 2023.

WHEREFORE, undersigned counsel respectfully requests the Court to continue the status conference currently scheduled for April 10, 2023, to another date at the Court's discretion on a date after April 13, 2023.

Jupiter FL 33477; and 2413 Roma Drive, Philadelphia, PA 19145.

Dated: March 20, 2023

Respectfully Submitted,

**STUMPHAUZER KOLAYA
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By: /s/ Timothy A. Kolaya
TIMOTHY A. KOLAYA
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Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on March 20, 2023, 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