UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA ASE NO.: 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

MOTION TO WITHDRAW JACQUELINE Z. DEROVANESIAN AS COUNSEL

Pursuant to Local Rule 7.1, Jacqueline Z. DerOvanesian, formerly of Stumphauzer Kolaya Nadler & Sloman, PLLC, moves this Court for an Order withdrawing her as counsel for the Receiver Ryan K. Stumphauzer in the above-captioned matter and directing the Clerk of the Court to remove Ms. DerOvanesian from receiving CM/ECF filings in the cases, and in support thereof states as follows:

1. As of April 22, 2023, Jacqueline DerOvanesian will no longer be employed by Stumphauzer Kolaya Nadler & Sloman, PLLC.

2. Following Jacqueline DerOvanesian's withdrawal, Receiver Ryan K. Stumphauzer will continue to be represented by the remaining counsel of record at Stumphauzer Kolaya Nadler & Sloman, PLLC, at Two South Biscayne Boulevard, Suite 1600, Miami, FL 33132, as well as the counsel of record at Pietragallo Gordon Alfano Bosick & Raspanti, LLP.

3. Receiver Ryan K. Stumphauzer does not object to Ms. DerOvanesian's withdrawal.

WHEREFORE, Jacqueline DerOvanesian requests that the Court enter an Order withdrawing her as counsel for Receiver Ryan K. Stumphauzer and directing the Clerk of the Court

to remove her from receiving CM/ECF filings in these cases. For the Court's convenience, a

proposed order is attached hereto as Exhibit A.

Dated: April 19, 2023

Respectfully Submitted,

STUMPHAUZER KOLAYA NADLER & SLOMAN, PLLC Two South Biscayne Boulevard, Suite 1600 One Biscayne Tower Miami, FL 33131 Telephone: (305) 614-1400 Facsimile: (305) 614-1425

By: <u>/s/ Jacqueline Z. DerOvanesian</u> Jacqueline Z. DerOvanesian, Esq. Fla. Bar No. 125662 jderovanesian@sfslaw.com

Attorney for Receiver Ryan K. Stumphauzer

CERTIFICATE OF SERVICE

I certify that on this 19th day of April, 2022, I electronically filed this document with the

Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

<u>/s/ Jacqueline Z. DerOvanesian</u> Jacqueline Z. DerOvanesian

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

ORDER GRANTING MOTION TO WITHDRAW JACQUELINE Z. DEROVANESIAN <u>AS COUNSEL</u>

THIS CAUSE came before the Court upon Motion to Withdraw Jacqueline Z.

DerOvanesian as Counsel for Receiver Ryan K. Stumphauzer.

THE COURT has considered the Motion, and being otherwise fully advised in the

premises, it is: ORDERED AND ADJUDGED:

1. The Motion is **GRANTED**.

2. Jacqueline Z. DerOvanesian is terminated as counsel for Receiver Ryan K. Stumphauzer.

DONE AND ORDERED in Fort Lauderdale, Florida, this _____ day of ______, 2023.

RODOLFO A. RUIZ II UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record