

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,

and

THE LME 2017 FAMILY TRUST, a/k/a

LME 2017 FAMILY TRUST,

Relief Defendant.

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**DEFENDANT, MICHAEL C. FURMAN'S, MOTION TO  
RELEASE SEALED TRIAL TRANSCRIPTS**

Pursuant to the applicable rules of this Court, Defendant, Michael C. Furman ("*Furman*"), by and through the undersigned counsel, hereby requests that the Court issue an Order to release sealed trial transcripts dated December 8, 2021 (the "*Motion*"), and in support thereof, Furman states as follows:

1. On December 8, 2021, this Court held day 3 of trial, which is referenced at DE's 1081, 1082, and 1084.
2. Furman is currently in the process of appeal and on April 17, 2023, filed his Transcript Information Form requesting the December 8, 2021 trial transcript [DE 1549].
3. To date, no transcript has been received because it is currently filed under seal.
4. Accordingly, Furman requests an Order from this Court releasing the Transcript of Trial Day 3, dated December 8, 2021, as referenced in DE's 1081, 1082 and 1084.

5. This request is being made in good faith and not for the purpose of delay or any other improper purpose. The requested rescheduling will not prejudice any party and is imperative to Furman's preparation of appeal.

WHEREFORE, Defendant, Michael C. Furman, respectfully requests that the Court enter an Order: (i) Granting the Motion, (ii) directing the Clerk of Court to release the Transcript of Trial Day 3, dated December 8, 2021, as referenced in DE's 1081, 1082 and 1084; and (iii) Granting such further relief as the Court deems just and proper.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)**

I HEREBY CERTIFY that counsel for the Movant has conferred with all parties or non-parties who may be affected by the relief sought in this Motion in a good faith effort to resolve the issue and that as of the filing of the instant motion, counsel for the SEC has not responded to the inquiry. However, given the due date of Furman's brief of June 1, 2023, Furman requests that the Court address this Motion on an expedited basis.

Respectfully submitted,

**MILLENNIAL LAW, INC.**

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this **25th** day of May, 2023, the foregoing was filed using the Court's CM/ECF Filing system which will transmit Notices of Electronic Filing generated by CM/ECF to all counsel of record.

By: s/ Zachary P. Hyman  
Zachary P. Hyman