

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No: 9:20-CV-81205

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

vs.

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

Defendants

**UNOPPOSED MOTION TO ALLOW
DEFENDANT BARLETA TO APPEAR VIA ZOOM**

COMES NOW, JOSEPH COLE BARLETA (“Cole”), by and through his undersigned counsel, seek permission to allow him to appear by Zoom at the hearing scheduled for June 5, 2023. Cole states the following in support:

1. This Court entered an Order on April 26, 2023 granting Receiver’s Motion for Order to Show Cause why Defendant Joseph Cole Barleta should not be held in civil contempt of Court for not complying with his discovery obligations [D.E. 1553].
2. The Order from this Court is that the hearing is evidentiary in nature. As Cole is the subject of the Court’s inquiry as to whether he should be held in contempt of Court or not, he would like to participate in the hearing, if not actually provide testimony.

3. This is even more important if the Court sets Cole's Expedited Motion to Modify the Preliminary Injunction on the same date [D.E. 1572].
4. Regardless, Cole cannot easily travel because he was indicted in the Eastern District of Pennsylvania. [See D.E. 1569].
5. As such, Cole respectfully requests this Court allow Cole to appear by Zoom at the June 5, 2023 hearing.

Date: May 31, 2023

Respectfully submitted,

Law Offices of Andre G. Raikhelson, LLC.
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/s/ Andre G. Raikhelson
Andre G. Raikhelson Esq.
Bar Number: 123657

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 31, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Andre G. Raikhelson
Andre G. Raikhelson Esq.

LOCAL RULE 7.3(a)

Undersigned counsel has met and conferred with counsel for the Receiver, who do not oppose the relief sought.

/s/ Andre G. Raikhelson
Andre G. Raikhelson Esq.