

**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.

**NOTICE OF SCRIVENER'S ERROR IN RECEIVER'S
MOTION TO REIMPOSE LITIGATION STAY AS TO CLAIMS
AGAINST ECKERT SEAMANS AND/OR JOHN W. PAUCIULO**

Ryan K. Stumphauzer, Court-Appointed Receiver of the Receivership Entities,¹ hereby files this Notice of Scrivener's Error in Receiver's Motion to Reimpose Litigation Stay as to Claims

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; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment Fund 2 LP; MK Corporate Debt Investment Company LLC; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consultants, 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; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and ALB Management, Inc., and the Receivership also includes the properties located at 568 Ferndale Lane,

Against Eckert Seamans Cherin & Mellott, LLC and John W. Pauciulo [ECF No. 1598] (the “Motion to Reimpose Stay”), and states:

1. On June 15, 2023, the Receiver filed his Motion to Reimpose Stay.

2. Paragraph 5 of the Motion to Reimpose Stay provides:

On June 7, 2023, after numerous discussions and substantial work, the Receiver and counsel representing the investor plaintiffs in the *Melchior, Montgomery* **and Parker** cases listed above reached an agreement in principle to resolve the Receivership Entities’ claims and the investor plaintiffs’ claims against Eckert Seamans and John W. Pauciulo. The settlement will result in a substantial payment into the Receivership Estate of the remaining limits on the eroding insurance policies that may provide coverage for the Receivership Entities’ claims against Eckert Seamans and John W. Pauciulo.

[Motion to Reimpose Stay, at ¶ 5 (emphasis added)].

3. The reference to the *Parker* case in paragraph 5 was in error, as the bolded and underlined text was supposed to be a reference to the *Caputo* case.

4. Accordingly, the Receiver provides notice that Paragraph 5 of the Motion to Reimpose Stay is hereby corrected to the following:

On June 7, 2023, after numerous discussions and substantial work, the Receiver and counsel representing the investor plaintiffs in the *Melchior, Montgomery* and *Caputo* cases listed above reached an agreement in principle to resolve the Receivership Entities’ claims and the investor plaintiffs’ claims against Eckert Seamans and John W. Pauciulo. The settlement will result in a substantial payment into the Receivership Estate of the remaining limits on the eroding insurance policies that may provide coverage for the Receivership Entities’ claims against Eckert Seamans and John W. Pauciulo.

Haverford, PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter, FL 33477; and 2413 Roma Drive, Philadelphia, PA 19145.

Dated: June 26, 2023

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 26, 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