

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 20-CV-81205-RAR/REINHART

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

Defendants.

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**NON-PARTY PACIFIC LIFE INSURANCE COMPANY’S UNOPPOSED  
MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE  
RECEIVER’S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1 of the Local Rules of Court for the Southern District Florida, Non-Party Pacific Life Insurance Company (“Pacific Life”) specially appears and hereby moves, unopposed, for a seven-day enlargement of time to file its response to Receiver, Ryan K. Stumphauzer’s Motion to Compel Pacific Life Insurance Company’s Compliance with Subpoena (D.E. 1655) (the “Motion to Compel”). In support of this motion, Pacific Life states the following:

1. On August 24, 2022, Receiver, Ryan K. Stumphauzer (the “Receiver”) served a subpoena duces tecum on Non-Party Pacific Life seeking certain documents relating to the Company’s administration of life insurance policies during the COVID-19 pandemic. *See* Motion to Compel, Ex. 1.

2. On or about October 6, 2022, Pacific Life responded to the Receiver’s subpoena *duces tecum*, produced a responsive document, and provided a Custodian of Records Affidavit

confirming that the document produced was a true and correct copy prepared in the ordinary course of business. Pacific Life subsequently confirmed that it did not have any additional documents responsive to the subpoena.

3. On August 9, 2023, almost a year after serving Non-Party Pacific Life with the subpoena, the Receiver filed his Motion to Compel against Non-Party Pacific Life seeking an order compelling Pacific Life to produce any additional responsive documents.

4. Non-Party Pacific Life recently retained undersigned counsel to assist in its response to the Receiver's Motion to Compel, which is currently due on August 23, 2023.

5. Due to undersigned counsel's recent retention, and the press of other matters including various briefing deadlines and hearings in other matters, Non-party Pacific Life respectfully requests an extension of time through and including August 30, 2023 to respond to the Receiver's Motion to Compel.

6. The requested extension will permit Pacific Life and its counsel an adequate opportunity to investigate the Receiver's allegations and arguments in the Motion to Compel, and prepare an appropriate response. The requested extension will also provide the Receiver and Pacific Life an opportunity to confer further in an effort to avoid additional Court action.

7. Counsel for the Receiver have graciously informed Pacific Life that they have no objection to the extension of time requested in this motion.

8. This request for an extension of time is reasonable, made in good faith, supported by good cause, and not interposed for delay or any other improper purpose. The request extension will not prejudice any party or non-party.

9. This is Non-Party Pacific Life's first request for an extension of time in this matter.

WHEREFORE, Non-Party Pacific Life respectfully requests that this Court enter an order granting an extension of time until August 30, 2023 for Pacific Life to respond to the Receiver's Motion to Compel. A proposed order will be emailed to the Court's ECF mailbox in connection with this motion.

Dated: August 23, 2023

Respectfully submitted,

*/s/ Todd M. Fuller*

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**ORDER ON NON-PARTY PACIFIC LIFE INSURANCE COMPANY'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME**

THIS CAUSE comes before the Court on Non-Party Pacific Life Insurance Company's Unopposed Motion for Extension of Time to respond to Receiver, Ryan K. Stumphauzer's Motion to Compel Pacific Life Insurance Company's Compliance with Subpoena (D.E. 1655). The Court having considered the Motion, and for good cause shown, it is hereby **ORDERED AND ADJUDGED** as follows:

1. Non-Party Pacific Life Insurance Company's Unopposed Motion is **GRANTED**.
2. Pacific Life shall have until August 30, 2023 to file their response to Receiver, Ryan K. Stumphauzer's Motion to Compel Pacific Life Insurance Company's Compliance with Subpoena (D.E. 1655).

**SO ORDERED.**

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BRUCE E. REINHART  
UNITED STATES MAGISTRATE JUDGE

Date: August \_\_\_\_, 2023