

**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.**

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**LISA MCELHONE’S MOTION FOR A BRIEF ENLARGEMENT OF TIME  
TO FILE A RESPONSE PURSUANT TO THE COURT’S ORDER TO SHOW CAUSE**

Defendant, Lisa McElhone (“Ms. McElhone”), by and through her undersigned counsel, hereby files this Motion for a brief enlargement of time to file a Response to the SEC’s Motion for an Order to Show Cause Why Defendant Lisa McElhone Should Not be Held in Civil Contempt (ECF No. 1729, the “Contempt Motion”), as directed in the Court’s Order for Defendant Lisa McElhone to Show Cause Why She Should Not Be Held in Contempt (ECF No. 1732, the “Order to Show Cause”), and as support therefore state as follows:

1. On October 20, 2023, the SEC filed its Contempt Motion, in which it asked the Court to order Ms. McElhone to show cause why she should not be held in civil contempt for her failure to pay the disgorgement, prejudgment, and post judgment interest required by this Court’s November Amended Final Judgment – which the SEC calculates to be approximately \$157 Million as of the date the Contempt Motion was filed.

2. On October 24, 2023, the Court entered its Order to Show Cause, which requires Ms. McElhone to file a written response to the SEC’s Contempt Motion on or before November 13, 2023

showing cause why she should not be held in civil contempt. The Court also directed that an in-person hearing on the Order to Show Cause be held on November 27, 2023.

3. Ms. McElhone has meritorious defenses to the Contempt Motion which she wishes to present in a fulsome Response. However, due to the press of other deadlines in undersigned counsel's other cases and in this matter (including Reply briefs in Ms. McElhone's appeal of the Amended Final Judgment that is the subject of the Contempt Motion, which were filed on the November 2, 2023), Ms. McElhone respectfully requests that the deadline for her to file her Response to the Contempt Motion be extended through November 16, 2023 at 12:00 P.M. Eastern.

4. Ms. McElhone's counsel conferred with counsel for the SEC and was advised that the SEC does not oppose the requested extension.

5. Ms. McElhone is seeking the requested extension due to the foregoing circumstances, and not for the purposes of delay. No party will be prejudiced if the extension is granted.

WHEREFORE, Ms. McElhone respectfully requests an extension of time, up to and including November 16, 2023 at 12:00 P.M. Eastern, to file her Response to the SEC's Contempt Motion

**S.D. Fla L. R. 7.1(a)(3) Certification of Counsel**

Counsel for Ms. McElhone hereby certify that they have conferred with counsel for the SEC in a good faith effort to resolve the issues raised in this motion and are authorized to state that the SEC does not oppose the requested extension.

Respectfully submitted,

**KAPLAN ZEENA LLP**

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By: /s/ James M. Kaplan

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 7<sup>th</sup> day of November, 2023, I electronically filed the forgoing 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 transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ James M. Kaplan

JAMES M. KAPLAN