

**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.

**LISA MCELHONE’S NOTICE OF WITHDRAWAL
OF HER MOTION TO STRIKE THE SEC’S RESPONSE TO
MS. MCELHONE’S MOTION TO MODIFY THE ASSET FREEZE ORDER**

PLEASE TAKE NOTICE that Defendant Lisa McElhone (“Ms. McElhone”) hereby withdraws her Motion to Strike the SEC’s Response to Ms. McElhone’s Motion to Modify the Asset Freeze Order (the “Motion to Strike”). The Motion to Strike was included in Ms. McElhone’s Response in Opposition to the SEC’s Motion for an Order to Show Cause (the “Response,” DE 1752). All portions of Ms. McElhone’s Response – other than her request to strike the SEC’s Response to the Motion to Modify the Asset Freeze Order (DE 1730) – are not withdrawn and are hereby expressly preserved. Counsel for Ms. McElhone conferred with counsel for the SEC and confirmed that the SEC consents to Ms. McElhone’s withdrawal of the Motion to Strike.

Dated: November 16, 2023.

KAPLAN ZEENA LLP

Attorneys for Defendant Lisa McElhone
2 South Biscayne Boulevard, Suite 3050
Miami, Florida 33131
Telephone: (305) 530-0800
Facsimile: (305) 530-0801

By: /s/ James M. Kaplan

JAMES M. KAPLAN
Florida Bar No.: 921040
james.kaplan@kaplanzeena.com
elizabeth.salom@kaplanzeena.com
service@kaplanzeena.com
NOAH E. SNYDER
Florida Bar No.: 107415
noah.snyder@kaplanzeena.com
maria.escobales@kaplanzeena.com
julie.valdes@kaplanzeena.com

LAW OFFICES OF ALAN S. FUTERFAS

565 Fifth Avenue, 7th Floor
New York, New York 10017
Telephone: 212-684-8400
asfuterfas@futerfaslaw.com
Attorneys for Lisa McElhone

By: /s/ Alan S. Futerfas

ALAN S. FUTERFAS
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of November 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 transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ James M. Kaplan

JAMES M. KAPLAN