

**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.,**

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S NOTICE OF
FILING STATUS REPORT PER THE COURT'S ORDERS**

Pursuant to the Court's Orders [ECF No. 1797 & 1798], Plaintiff Securities and Exchange Commission hereby files a status update regarding Receiver, Ryan K. Stumphauzer's Thirtieth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings [ECF No. 1795] and Motion for Order Authorizing Receiver's Sale of Real Property Located at 1427-1435 Melon Street, Philadelphia, PA 19130 [ECF No. 1794].

Commission counsel conferred by telephone with the Receiver's counsel, who advised that if the litigation stay is lifted, no litigation will occur with respect to reopening confessions of judgment other than to file appropriate notices that the confessions of judgment have been satisfied or should be dissolved. There will be no cost to investors for those filings because a secretary would file them without charge to the receivership. Further, if the stay is lifted, no new cases would be filed and no disputed litigation would occur. The Commission's questions were answered and the Commission has no objection to the Motion to Lift Litigation Injunction and takes no position on the relief sought in the filings the Receiver intends to file if the Motion is granted [ECF No. 1795]. The Receiver's counsel communicated his good faith belief that he did not need to confer

about the details of this Motion based on the Commission's position with respect to prior similar filings and will confer in full on all future filings pursuant to the Local Rules.

During the same conferral call, the Receiver's counsel conferred with the Commission about the sale at issue in the Receiver's Motion for Order Authorizing Receiver's Sale of Real Property Located at 1427-1435 Melon Street, Philadelphia, PA 19130 [ECF No. 1794]. After conferring about the details of the sale terms, the Commission has no objection to the terms of the sale.

February 5, 2024

Respectfully submitted,
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