

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 9:20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS GROUP,
INC. D/B/A PAR FUNDING, *et al.*,

Defendants.

**COUNSEL FOR NON-PARTY TOORAK CAPITAL
PARTNERS, LLC'S MOTION TO WITHDRAW**

Counsel for Non-Party, TOORAK CAPITAL PARTNERS, LLC, a Delaware limited liability company (“Toorak”), by and through its undersigned attorneys, hereby moves the Court for an order allowing it to withdraw as counsel for TOORAK CAPITAL PARTNERS, LLC, and to be removed from the service for all pleadings in this matter, stating as follows:

1. Toorak is a non-party to this case who retained the undersigned counsel to represent in a request to intervene in this action in order to allow Toorak to proceed with two foreclosure actions in New York state court: *Toorak Capital Partners, LLC v. 145 Stuyvesant Ave Prop LLC et al.*, Index No. 500868/2021 (the “145 Stuyvesant Foreclosure Action”), which named Complete Business Solutions Group, Inc. d/b/a Par Funding (“CBSG”) as a junior lienholder defendant and *Toorak Capital Partners, LLC v. 347A Quincy St Prop LLC, et al.*, Index No. 501908/2021 (the “347A Quincy Foreclosure Action” and collectively, with the 145 Stuyvesant Foreclosure Action, the “Foreclosure Actions”), which named Fast Advance Funding Inc. (“Fast Advance”) as a junior lienholder defendant.

2. On or about September 30, 2022, the Court has ruled on Toorak's motion [ECF 1391] and entered an order lifting the litigation stay [ECF 1422] and allow Toorak to proceed with its foreclosures.

3. Toorak, being a non-party, was denied the ability to intervene in this action and therefore, to this date, remains a non-party to this action. Accordingly, Toorak's involvement in this action has essentially ended.

4. Where Toorak's involvement in this action has ended, the undersigned counsel would like to request an order allowing it to withdraw its appearance in this matter and to be removed from the service for all pleadings.

WHEREFORE, the undersigned counsel hereby requests the Court enter an order allowing it to withdraw as counsel for Non-Party TOORAK CAPITAL PARTNERS, LLC, and to be removed from the service for all pleadings in this matter.

Dated: March 14, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Notice of Electronic Filing by CM/ECF transmission to all counsel and parties who are registered to receive such service in this case on March 14, 2024.

/s/ Nardo Dorsin
Nardo Dorsin