

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	
)	
vs.)	Case. No. 20-CV-81205-RAR
)	
COMPLETE BUSINESS SOLUTIONS)	
GROUP, INC. <i>et al.</i> ,)	
)	
Defendants.)	

Case. No. 20-CV-81205-RAR

**MERCHANT VICTIMS’ MOTION TO PERMIT
CONSOLIDATED RESPONSE EXCEEDING PAGE LIMIT**

Radiant Images, Inc. and Gianna Wolfe (“Radiant”), Tourmappers North America, LLC and Julie Katz (Tourmappers”), HMC Inc. and Kara DiPietro (“HMC”), Gex Management, Inc. and Carl Dorvil (“Dorvil”), Joshua Speakman and Knava’s Bounce House Rentals, LLC (“Knavas”), Shaun Alldredge and Legend Adventures, LLC (“Legend”), MH Marketing Solutions Group, Inc. and Michael Heller (“Heller”), Sunrooms America, Inc. and Michael Foti (“Sunrooms”), Petropangea, Inc. and JR Harrison (“Petropangea”), Volunteer Pharmacy, LLC and Chad Frost (“Volunteer”), and Sean Whalen and Yngris Iris Chen (“Whalen”) (collectively, the “Merchant Victims”), by and through undersigned counsel, respectfully seek leave of the Court to file a single, 20-page consolidated response to the Receiver’s Motion to Approve Proposed Treatment of Claims and for Determination of Ponzi Scheme [ECF No. 1843 (the “Motion” or “Mtn.”)], and in support thereof state:

On April 22, 2024, the Receiver filed the Motion and the next day, on April 23, 2024, the Court entered an Order that required responses to the Receiver’s Motion to be filed no later than

May 7, 2024. [ECF No. 1845.] The Order also directed that responses not exceed ten (10) pages. *Id.* There are 11 Merchant Victims represented by the undersigned counsel whose claims are addressed in the Receiver’s Motion. If each Merchant Victim were to file a separate response, that would require the filing of 11 ten-page motions equaling a total of 110 pages of briefing.

So as to conserve the Court’s time and resources and avoid filing 11 separate responses, the Merchant Victims request leave of the Court to file a single consolidated response for all 11 Merchant Victims and that the page limit for this consolidated response be no more than 20 pages. *See Chudasama v. Mazda Motor Corp.*, 123 F.3d 1353, 1366 (11th Cir. 1997) (“We recognize that district courts enjoy broad discretion in deciding how best to manage the cases before them.”). Undersigned counsel respectfully suggests that permitting a single, 20-page consolidated response on behalf of the 11 Merchant Victims is necessary, reasonable and fair.

UNDERSIGNED COUNSEL HEREBY CERTIFIES that, pursuant to the Local Rules, undersigned counsel conferred with counsel for the Receiver and the SEC concerning the relief requested herein. Both the Receiver and the SEC stated that they took no position as the Merchant Victims’ request.

WHEREFORE, the Merchant Victims respectfully request this Court grant them leave to file one 20-page consolidated response.

Dated: May 3, 2024

Respectfully Submitted,

ALMEIDA LAW GROUP LLC

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2024, I electronically filed the foregoing with the Clerk of the Court using CM/ECF which will send notification of such filing to counsel of record.

/s/ Matthew J. Langley

Matthew J. Langley