

**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.

**JOSEPH LAFORTE AND LISA MCELHONE’S MOTION TO
PERMIT JOINT RESPONSE EXCEEDING PAGE LIMIT**

Defendants Joseph LaForte and Lisa McElhone (“Defendants”), by and through their undersigned counsel, respectfully seek leave of the Court to file a consolidated joint response not exceeding 20 pages to the Receiver’s Motion to Approve Proposed Treatment of Claims and for Determination of Ponzi Scheme. (*See* ECF No. 1843, the “Motion”).

On April 22, 2024, the Receiver filed the Motion. On April 23, 2024, the Court entered an Order that required responses to the Receiver’s Motion be filed no later than May 7, 2024, and directed that responses shall not exceed ten (10) pages. (ECF No. 1845). Defendants are therefore permitted to file separate responses which, combined, could total 20 pages.

In the interest of conserving the Court’s time and resources, and avoiding the filing of two briefs that overlap in substance, Defendants request leave of the Court to file a single joint response not to exceed 20 pages. A joint brief is the best vehicle to provide this Court with a thorough response to the Motion, including a response to the Receiver’s determination regarding their thirteen (13) claims, and an analysis of the Receiver’s request for determination of “Ponzi scheme.”

The Defendants also note that other interested parties have been permitted to file oversized joint briefs (*see* ECF 1857).

Accordingly, Defendants respectfully request that the Court exercise its discretion to permit Defendants to file a joint response to the Motion which may be up to 20 pages in length. *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.”).

WHEREFORE, Defendants respectfully request this Court grant them leave to file a joint response to the Motion not to exceed 20 pages.

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

UNDERSIGNED COUNSEL HEREBY CERTIFY that, pursuant to the Local Rules, undersigned counsel conferred with counsel for the Receiver concerning the relief requested herein, and were advised that the Receiver does not oppose the requested relief.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May, 2024, 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