

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 20-cv-81205-RUIZ**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS  
GROUP, INC. d/b/a PAR FUNDING, et al.,

Defendants.

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**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of ERIC LECHTZIN of the law firm of EDELSON LECHTZIN LLP, 411 S. State Street, Suite N-300, Newtown, PA 18940, Tel.: 215-867-2399, for purposes of appearance as co-counsel on behalf of the plaintiffs in the putative class action captioned *Melchior v. Vagnozzi*, No. 20-cv-05562 (E.D. Pa) (Perez, J.) in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit ERIC LECHTZIN to receive electronic filings in this case, and in support thereof states as follows:

1. ERIC LECHTZIN is not admitted to practice in the Southern District of Florida and is a member in good standing of the Bars of the States of California, New Jersey, and Pennsylvania.

2. Movant, Jeffrey C. Schneider, Esquire, Florida Bar No. 933244, of the law firm of Levine Kellogg Lehman Schneider + Grossman LLP, Miami Tower, 100 S.E. 2nd Street, 36th Floor, Miami, FL 33131, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of

the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, ERIC LECHTZIN has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. ERIC LECHTZIN, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to ERIC LECHTZIN at email address: [elechtzin@edelson-law.com](mailto:elechtzin@edelson-law.com).

WHEREFORE, Jeffrey C. Schneider, Esquire, moves this Court to enter an Order ERIC LECHTZIN, to appear before this Court on behalf of plaintiffs in the putative class action captioned *Melchior v. Vagnozzi*, No. 20-cv-05562 (E.D. Pa) (Perez, J.), for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to ERIC LECHTZIN.

Date: May 15, 2024

Respectfully submitted,

*/s/ Jeffrey C. Schneider*

Jeffrey C. Schneider, Florida Bar No. 933244  
LEVINE KELLOGG LEHMAN  
SCHNEIDER + GROSSMAN LLP  
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Attorneys for plaintiffs in the putative class action captioned  
*Melchior v. Vagnozzi*, No. 20-cv-05562 (E.D. Pa) (Perez, J.)

**UNITED STATES DISTRICT COURT  
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v.

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GROUP, INC. d/b/a PAR FUNDING, et al.,

Defendants.

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**CERTIFICATION OF ERIC LECHTZIN**

ERIC LECHTZIN, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of Bars of the State of California (Bar Number 248958), the State of New Jersey (Bar Number 011841992), and the Commonwealth of Pennsylvania (Bar Number 62096); and (3) I have not filed more than three *pro hac vice* motions in different cases in this District within the last 365 days.



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ERIC LECHTZIN

# Supreme Court of New Jersey



## Certificate of Good Standing

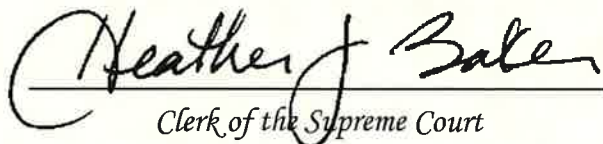
This is to certify that **Eric Lechtzin**  
(No. **011841992** ) was constituted and appointed an Attorney at Law of New Jersey on **June 11, 1992** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this 29th day of April, 2024.



  
Clerk of the Supreme Court



# Supreme Court of California

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

**ERIC LECHTZIN**

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that, ERIC LECHTZIN #248958 was on the 30<sup>th</sup> day of May, 2007 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 22<sup>nd</sup> day of April 2024.*

JORGE E. NAVARRETE

*Clerk/Executive Officer of the Supreme Court*

By: \_\_\_\_\_

*LaNae Brooks, Senior Deputy Clerk*



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

*Eric Lechtzin, Esq.*

DATE OF ADMISSION

*December 10, 1991*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 16, 2024

*Darian Holland*

Darian Holland  
Chief Clerk



UNITED STATES DISTRICT COURT  
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Defendants.

\_\_\_\_\_ /

**ORDER GRANTING MOTION TO APPEAR  
*PRO HAC VICE*, CONSENT TO DESIGNATION AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* for ERIC LECHTZIN, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. ERIC LECHTZIN, may appear and participate in this action on behalf of plaintiffs in the putative class action captioned *Melchior v. Vagnozzi*, No. 20-cv-05562 (E.D. Pa) (Perez, J.). The Clerk shall provide electronic notification of all electronic filings to ERIC LECHTZIN, at [elechtzin@edelson-law.com](mailto:elechtzin@edelson-law.com).

DONE AND ORDERED in Chambers at \_\_\_\_\_, Florida, this  
\_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
United States District Judge

Copies furnished to: All Counsel of Record