

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Securities & Exchange Commission,

Case No.: 9:20-cv-81205-RAR

Plaintiff,

v.

Complete Business
Solutions Group, Inc., *et*
al.

Defendants.

**NOTICE OF PARKER PLAINTIFFS' JOINDER IN
MOTION FOR STATUS CONFERENCE AND REQUEST TO BE HEARD**

Non-parties Mark Nardelli, Francis Cassidy, David Gollner and Christopher McMorrow (the "Parker Plaintiffs") respectfully submit this Notice of Joinder in the Motion for Status Conference Regarding Final Approval Hearing for Settlement Among Receiver, Putative Class Plaintiffs, and Eckert Seamans [DE #1923], filed by Dean Vagnozzi, and in support thereof, state as follows:

1. The Parker Plaintiffs are plaintiffs in *Dean Parker et al. v. John W. Pauciulo and Eckert Seamans*, pending in the Court of Common Pleas of Philadelphia County, Case No. 0892, December Term 2020. In that action -- which is subject to the Court's stay orders -- the Parker Plaintiffs seek \$47,000,000 in damages from their counsel, Eckert Seamans.

2. Given the Court's May 21, 2024 Order setting a Zoom status conference for May, 23, 2024, at 3:15 p.m. [DE #1925], the Parker Plaintiffs submit this Joinder for the sole purpose of informing the Court that they intend to object to the proposed settlement, and seek the Court's guidance as to the procedure for the hearing on the Receiver's motion to approve the settlement.

3. To that end, the Parker Plaintiffs have been requesting that the Receiver provide information concerning the proposed settlement for quite some time, but the Receiver has not responded and has excluded the Parker Plaintiffs from the process. Indeed, despite the Parker Plaintiffs repeated efforts, there have no direct discussions with the Receiver or his counsel since June 8, 2023.

Dated: May 22, 2024

Respectfully submitted,
HAINES & ASSOCIATES

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-and-

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on May 22, 2024, via the Court's ECF Filing System, on all counsel in this matter.

/s/ Jonathan E. Minsker
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