UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-CIV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

/

WILLIAM G. WOLK, ESQ.'S AND EATON & WOLK, PL'S MOTION TO WITHDRAW AS LOCAL COUNSEL

Movants WILLIAM G. WOLK, ESQ. and EATON & WOLK, PL move this Court to enter an order permitting them to withdraw as local counsel for Defendant DEAN VAGNOZZI and BOCHETTO & LENTZ, P.C. In support, Movants state as follows:

1. Undersigned counsel appeared in this matter as local counsel for George Bochetto, Esq. of Bochetto & Lentz, P.C. Mr. Bochetto represents party Dean Vagnozzi.

2. Attorney Matthew L. Minsky, who is admitted to practice in Florida, has since joined the Bochetto & Lentz firm and will serve as sponsoring counsel for Mr. Bochetto pursuant to Fla.Bar.R.4-5-5(c)(1) going forward. As a result, undersigned counsel's work in this case has ended.

3. We therefore respectfully move the Court to permit Movants to withdraw as counsel.

4. Mr. Vagnozzi agrees with this request.

WHEREFORE, Movants WILLIAM G. WOLK, ESQ. and EATON & WOLK, PL

respectfully move the Court for an order permitting them to withdraw as local counsel and removing them from the service list for this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was electronically filed on May 30, 2024, with the CM/ECF filing portal, which will send a notice of electronic filing to all counsel of record.

Respectfully submitted,

EATON & WOLK, PL 2665 S. Bayshore Drive, Suite 609 Miami, Florida 33133 Telephone: 305-249-1640 Email: wwolk@eatonwolk.com mcomas@eatonwolk.com

By: *s/William G. Wolk* WILLIAM G. WOLK FBN: 103527