

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.

**PARKER PLAINTIFFS' OBJECTION AND RESERVATION OF RIGHTS WITH
RESPECT TO MOTION FOR APPROVAL OF ATTORNEYS' FUND**

Non-parties Mark Nardelli, Francis Cassidy, David Gollner and Christopher McMorrow (the "Parker Plaintiffs") respectfully submit this Objection and Reservation of Rights with Respect to the Motion for Approval of Attorneys' Fund [Dkt. #1913] (the "Motion"), filed on May 16, 2024 by Levine Kellogg Lehman Schneider & Grossman LLP on behalf of certain purported class counsel, and in support thereof, state as follows:

1. The Parker Plaintiffs object to the relief sought by the Motion. The factual and legal basis for the Parker Plaintiffs' objection will be set forth in detail in the Parker Plaintiffs' Objection to approval of the proposed settlement among the Receiver, Putative Class Plaintiffs, and Eckert Seamans (the "Objection").

2. The Parker Plaintiffs will file and serve the Objection when required by, and in accordance with, the Court's Order Preliminarily Approving Settlement Among Receiver, Putative Class Plaintiffs, and Eckert Seamans, dated May 13, 2024 [Dkt. #1906], and the Court's

Order Resetting Final Approval Hearing, dated May 29, 2024 [Dkt. #1945].

Dated: May 30, 2024

Respectfully submitted,
HAINES & ASSOCIATES

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*Admitted Pro Hac Vice for
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-and-

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Christopher McMorrow*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on May 30, 2024, via the Court's ECF Filing System, on all counsel in this matter.

/s/ Jonathan E. Minsker
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