

**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.

**VAGNOZZI PLAINTIFFS' OBJECTION AND RESERVATION OF RIGHT TO
CONTEST MOTION FOR APPROVAL OF ATTORNEYS' FUND**

Defendant, Dean Vagnozzi (“Vagnozzi”), and Non-Parties Albert Vagnozzi, Terrence Kohler, PTK Financial LLC, and Alec Vagnozzi (collectively “Vagnozzi Plaintiffs”), by and through undersigned counsel, hereby submits this Objection and Reservation of Rights to Contest Motion for Approval of Attorneys’ Fund [ECF No. 1913]:

1. The Vagnozzi Plaintiffs object to the attorney fees and costs sought by the Motion for Approval of Attorney Fees.
2. On May 6, 2024, the Receiver filed a Motion for: (I) Approval of Settlement Among Receiver, Putative Class Plaintiffs, and Eckert Seamans; (II) Approval of Form, Content and Manner of Notice of Settlement and Bar Order; (III) Setting Deadline to Object to Approval of the Settlement and Entry of Bar Order; and (IV) Scheduling a Hearing. [ECF No. 1861].

3. On May 13, 2024, the Court entered an Order Preliminarily Approving Settlement Among Receiver, Putative Class Plaintiffs, and Eckert Seamans, and setting forth a schedule for the filing objections and a final approval hearing. [ECF No. 1906].

4. On May 30, 2024, after a status conference, the Court entered an Order resetting the Final Approval Hearing for August 13, 2024, and resetting the objection deadlines to no later than thirty (30) days before the Final Approval Hearing. [ECF No. 1945]

5. The proposed Settlement includes a provision that counsel for the Putative Class Plaintiffs would receive \$6.75 million in attorney fees, and in that regard, on May 16, 2024, Counsel for the Putative Class Plaintiffs filed a Motion for Approval of Attorneys' Fund, seeking court approval of its requested \$6.75 million fee. [ECF No. 1913].

6. The Vagnozzi Plaintiffs intend to include the factual and legal basis of their objections to the attorney fees sought by Counsel for the Putative Class in the Objections to be filed as part of the Receiver's Motion for Approval of Settlement, which will be filed on or before July 15, 2024.

Respectfully submitted,

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Attorneys for Dean Vagnozzi

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that the foregoing document was electronically filed June 6, 2024 with the CM/ECF filing portal, which will send a notice of electronic filing to all counsel of record.

Respectfully submitted, this 6th day of June 2024.

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