

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

CASE NO. 20-CV-81205-RAR

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

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

Defendants.

**ORDER GRANTING RECEIVER’S COMBINED THIRTY-FIRST MOTION TO LIFT
LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS
AND MOTION TO LIFT LITIGATION INJUNCTION AS TO
CERTAIN FORECLOSURE PROCEEDINGS**

THIS CAUSE comes before the Court upon the Receiver’s Combined Thirty-First Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings and Motion to Lift Litigation Injunction as to Certain Foreclosure Proceedings (“Motion”), [ECF No. 1968], filed on June 21, 2024.

In Section I of the Motion, the Receiver seeks to modify the Court’s Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], so as to lift the litigation injunction provided for in that Order for certain garnishment matters, which are currently pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, to be opened for the limited purpose of authorizing the Receiver, in his direction, to dissolve current writs of garnishment, to mark judgments satisfied, and/or to reopen confessed judgments, where the counterparty merchant either has resolved, or has agreed to resolve, prior defaults, or otherwise filed for bankruptcy protection.

The Receiver has made a sufficient and proper showing in support of the relief requested.

Accordingly, it is hereby

ORDERED AND ADJUDGED that the Receiver's Motion is **GRANTED** with respect to the relief requested in Section I of the Motion. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], is hereby lifted in the following matters in the Court of Common Pleas of Philadelphia County, Pennsylvania, and solely for the purpose as described in the Motion:

- a. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. In and Out All Access System Inc. d/b/a In and Out All Access System d/b/a Florida Sliding and Garage Door d/b/a FL All Access and Valeria Nikitin*, Philadelphia Court of Common Pleas, Docket No. 190903616.
- b. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Redpill Medical Inc. d/b/a Red Pill Medical and Gregory Smith*, Philadelphia Court of Common Pleas, Docket No. 190900194.
- c. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. HLM Concrete Contractors LLC d/b/a HLM Contractors and Harry L. Mainor, III*, Philadelphia Court of Common Pleas, Docket No. 190703469.
- d. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Harsted Appliance Repair LLC d/b/a K & L Appliance Repair d/b/a Inland Empire Appliance Repair, Willima Harsted and Joslin Harsted*, Philadelphia Court of Common Pleas, Docket No. 190700655.
- e. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Engineered Systems and Equipment Inc. d/b/a Engineered Systems and Equipment d/b/a Engineered Systems & Equipment, and Joseph Barbi*, Philadelphia Court of Common Pleas, Docket No. 200201405.
- f. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bissetts Quality Painting LLC d/b/a Bissett Quality Pro Painting, Laura Bissett, and Steven Bissett*, Philadelphia Court of Common Pleas, Docket No. 190302776.
- g. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bernard Francis Berard Sole Proprietor d/b/a Bernard F. Berard d/b/a Jericho Builders d/b/a Jericho Builders Construction Company and Bernard Francis Berard*, Philadelphia Court of Common Pleas, Docket No. 191000525.

- h. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hearthstone Senior Housing Inc. d/b/a Hearthstone Construction, Robert A. Blauner, and Brian Strum*, Philadelphia Court of Common Pleas, Docket No. 190606817.
- i. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ellis Concrete LLC d/b/a Ellis Concrete, and Arthur Ellis*, Philadelphia Court of Common Pleas, Docket No. 200400386.
- j. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. The Chonillo Law Group LLC d/b/a The Chonillo Law Group, and Greg Chonillo*, Philadelphia Court of Common Pleas, Docket No. 191003897.

In Section II of the Motion, the Receiver seeks to modify the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], for the limited purpose of lifting the litigation injunction provided for in that Order relating to the case captioned *U.S. Bank. v. Pritimayee Nayak, et al.*, in the Middlesex County Superior Court of New Jersey at Case No. SWC-F-003513-21.

The Receiver has made a sufficient and proper showing in support of the relief requested in Section II of the Motion. Accordingly, it is hereby

ORDERED AND ADJUDGED that the Receiver's Motion is **GRANTED** with respect to the relief requested in Section II thereof. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], is hereby lifted so as to allow proceedings to continue in the case captioned *U.S. Bank. v. Pritimayee Nayak, et al.*, in the Middlesex County Superior Court of New Jersey at Case No. SWC-F-003513-21.

In Section III of the Motion, the Receiver seeks to modify the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], for the limited purpose of lifting the litigation injunction provided for in that Order relating to the case captioned *WBL SPO II, LLC v. MH Marketing Solutions Group, Inc., et al.*, in the Burlington County Superior Court of New Jersey at Case No. SWC-F-000568-24.

The Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

ORDERED AND ADJUDGED that the Receiver's Motion is **GRANTED** with respect to the relief requested in Section III thereof. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], is hereby lifted so as to allow proceedings to continue in the case captioned *WBL SPO II, LLC v. MH Marketing Solutions Group, Inc., et al.*, in the Burlington County Superior Court of New Jersey at Case No. SWC-F-000568-24.

DONE AND ORDERED in Miami, Florida, this 21st day of June, 2024.

A handwritten signature in black ink, appearing to read 'Rodolfo A. Ruiz II', written over a horizontal line.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE