

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.

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**RECEIVER, RYAN K. STUMPHAUZER’S MOTION FOR EXTENSION OF TIME TO FILE REPLY, OR OTHERWISE ADVISE THE COURT, REGARDING [ECF NO. 1861] 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**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> by and through his undersigned counsel, hereby files this Motion for Extension of Time

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<sup>1</sup> The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“Par Funding”); Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; MK Corporate Debt Investment Company LLC; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consulting, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St.

to File Reply, or Otherwise Advise the Court, Regarding the 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 a Deadline to Object to approval of the Settlement and Entry of Bar Order; and (iv) Scheduling a Hearing; with Incorporated Memorandum of Law (the “Eckert Seamans Motion”), and states as follows:

1. On May 6, 2024, the Receiver filed the Eckert Seamans Motion [ECF No. 1861], through which he sought approval of a settlement agreement with, among others, the law firm of Eckert Seamans Cherin & Mellott (the “Eckert Seamans Settlement”).

2. On May 13, 2024, the Court entered an Order Preliminarily Approving the Eckert Seamans Settlement [ECF No. 1906] (the “Preliminary Approval Order”).

3. On Friday, July 12, 2024, and Monday, July 15, 2024, certain groups filed responses to the Eckert Seamans Motion in which they oppose final approval of the Eckert Seamans Settlement on various grounds [ECF Nos. 1987, 1989, 1992, 1993, 1994] (the “Responses”).

4. As the Receiver’s counsel discussed with the Court during the status conference on July 12, 2024 [ECF No. 1995], the Preliminary Approval Order does not indicate a date or deadline by which the Receiver is to file his reply to the Responses, and the standard 7-day reply deadline provided for under the Local Rules would not provide sufficient time for the Receiver to review what were expected to be (and are, in fact) lengthy Responses.

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LLC; 500 Fairmount Avenue, LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, LLC; LWP North LLC; The LME 2017 Family Trust; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and ALB Management, LLC; and the Receivership also includes the property located at 107 Quayside Dr., Jupiter FL 33477.

5. Accordingly, the Receiver respectfully requests that the Court establish a deadline of July 31, 2024, for the Receiver to file his reply to the Responses, or otherwise advise the Court regarding the status of the Eckert Seamans Settlement.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant this motion and establish a deadline of July 31, 2024, for the Receiver to file his reply to the Responses, or otherwise advise the Court regarding the status of the Eckert Seamans Settlement. A proposed order for the Court's consideration is attached as Exhibit 1.

**CERTIFICATION REGARDING PRE-FILING CONFERENCE**

The undersigned counsel discussed this matter in open court during the status conference on July 12, 2024, and counsel for the parties who filed the Responses were present and did not voice any objection to the Receiver's request for additional time beyond the standard briefing schedule provided for under the Local Rules for the Receiver to file a reply to the Responses or otherwise provide the Court with an update on the status of the Eckert Seamans Settlement.

Dated: July 19, 2024

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 19, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA

# Exhibit “1”

UNITED STATES DISTRICT COURT  
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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

Defendants.

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**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER’S MOTION FOR EXTENSION OF TIME TO FILE REPLY, OR OTHERWISE ADVISE THE COURT, REGARDING [ECF NO. 1861] 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**

**THIS CAUSE** comes before the Court upon the Receiver’s Motion for Extension of Time to File Reply, or Otherwise Advise the Court, Regarding the 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 a Deadline to Object to approval of the Settlement and Entry of Bar Order; and (iv) Scheduling a Hearing; with Incorporated Memorandum of Law [ECF No. \_\_\_\_\_] (the “Motion”), filed on July 19, 2024.

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**. The Receiver must file his reply to the Responses [ECF Nos. 1987, 1989, 1992, 1993, 1994] to the 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 a Deadline to Object to approval of the Settlement and Entry of Bar Order; and (iv) Scheduling a Hearing; with Incorporated Memorandum of Law [ECF No. 1861], or otherwise provide the Court with an update on the status of the settlement agreement with, among others, the law firm of Eckert Seamans Cherin & Mellott, by July 31, 2024.

**DONE AND ORDERED** in Miami, Florida, this \_\_\_\_ day of July, 2024.

\_\_\_\_\_  
**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

Copies to: Counsel of record