

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.

**RECEIVER, RYAN K. STUMPHAUZER’S MOTION FOR EXTENSION
OF TIME TO FILE MOTION TO (1) APPROVE PROPOSED PLAN OF
DISTRIBUTION AND (2) AUTHORIZE FIRST INTERIM DISTRIBUTION**

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

¹ 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. 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

Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution (the “Distribution Motion”), and states as follows:

1. In the Paperless Order dated July 12, 2024, the Court ordered the Receiver to file the Distribution Motion on or before August 16, 2024. [ECF No. 1991].

2. Since that time, the Receiver has been working diligently to analyze the assets within the Receivership Estate and the allowed claims as adjudicated in the Court’s Order Granting Receiver’s Motion to (1) Approve Proposed Treatment of Claims and (2) for Ponzi Determination [ECF No. 1976]. The Receiver has prepared a proposed distribution plan and a draft of the Distribution Motion. Although the Receiver has made significant progress in this regard, there are multiple factual and legal issues that are addressed in the Distribution Motion, and the Receiver requires additional time to finalize his analysis and prepare the Distribution Motion for filing. Accordingly, the Receiver respectfully requests that the Court grant the Receiver a one-week extension of time, through and including August 23, 2024, for the Receiver to file the Distribution Motion.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant this motion and extend the deadline by which the Receiver must file the Distribution Montion by one week, through and including August 23, 2024. A proposed order is attached as Exhibit 1.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel conferred with counsel for the Securities and Exchange Commission regarding this motion, and certifies that the Securities and Exchange Commission does not oppose the requested relief.

Quayside Dr., Jupiter FL 33477.

Dated: August 16, 2024

Respectfully Submitted,

**STUMPHAUZER KOLAYA
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By: /s/ Timothy A. Kolaya
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Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 16, 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
SOUTHERN DISTRICT OF FLORIDA**

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SECURITIES AND EXCHANGE
COMMISSION,

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v.

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

Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER'S MOTION
FOR EXTENSION OF TIME TO FILE MOTION TO (1) APPROVE PROPOSED PLAN
OF DISTRIBUTION AND (2) AUTHORIZE FIRST INTERIM DISTRIBUTION**

THIS CAUSE comes before the Court upon the Receiver's Motion for Extension of Time to File Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution (the "Distribution Motion"), dated August 16, 2024 [ECF No. ____] (the "Motion").

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 Distribution Motion on or before August 23, 2024

DONE AND ORDERED in Miami, Florida, this ____ day of August, 2024.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record