

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

SECURITIES AND EXCHANGE COMMISSION

Case No.: 9:20-cv-81205-RAR

v.

Plaintiff

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

Defendants

**OBJECTING PARTIES DEAN VAGNOZZI, ALBERT VAGNOZZI, ALEC
VAGNOZZI AND TERRY KOHLER'S MOTION TO WITHDRAW
VIDEO LINK FROM COURT FILING**

Dean Vagnozzi (“Dean”), Albert Vagnozzi (“Albert”), Alec Vagnozzi (“Alec”) (sometimes collectively referred to as the “Vagnozzis”), and Terry Kohler (“Kohler”) (collectively “Objecting Parties”), by and through undersigned counsel, Bochetto & Lentz, P.C. (“B&L”), hereby file this Motion to Withdraw the Video Link from Court Filing [ECF 2010] (“Motion”), and in support thereof state as follows:

1. On July 31, 2024, the Receiver filed a Motion to Stay the Court’s Consideration of Motion to Approve Settlement with Eckert Seamans for Period of 90 Days and to Require Mediation. *See* [ECF 2004].

2. On August 6, 2024, Objecting Parties filed Opposition *Nunc Pro Tunc* to the Receiver’s Motion to Stay (“Opposition”). *See* [ECF 2010].

3. In their Opposition, Objecting Parties included a link to a video statement of Dean Vagnozzi regarding Eckert’s malpractice. See footnote 2, [ECF 2010].

4. Following discussion with the SEC, Objecting Parties however hereby seek

permission of the Court to withdraw the video link in foot note 2, [ECF 2010] from the Court Filing.

5. This motion is not opposed by the SEC.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with counsel for Plaintiff in good faith. Counsel for Plaintiff does not oppose Objecting Parties' Motion.

Respectfully submitted,

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Attorneys for Dean Vagnozzi, Albert Vagnozzi, Alec Vagnozzi and Terry Kohler

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was electronically filed August 27, 2024, with the CM/ECF filing portal, which will send a notice of electronic filing to all counsel of record.

Respectfully submitted, this 27th day of August 2024.

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