

**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.

**DEFENDANTS LISA MCELHONE’S AND JOSEPH LAFORTE’S
MOTION FOR ENLARGEMENT OF TIME TO FILE THEIR RESPONSE
TO THE RECEIVER’S DISTRIBUTION MOTION [ECF NO. 2014]**

Defendants, Lisa McElhone and Joseph LaForte (“Defendants”), by and through their undersigned counsel, hereby file this Motion for a one-week enlargement of time to file their response to the Receiver’s Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution (the “Distribution Motion”, ECF No. 2014), and as support therefore state as follows:

1. The Receiver filed the Distribution Motion on August 23, 2024.
2. On August 26, 2024, the Court entered an Order Setting Briefing Schedule for Distribution Plan (the “Order,” ECF No. 2015), which requires all claimants with outstanding objections to the Distribution Motions (including Defendants) to file their responses to the Distribution Motion on or before September 9, 2024.
3. Defendants are in the process of analyzing the Receiver’s proposed plan of distribution, and anticipate filing a response to preserve their rights with respect to their appeal of the Final Judgments entered against them and the Order expanding the scope of the Receivership

(which is currently pending before the Eleventh Circuit), and Defendants' other rights and property interests.

4. Due to the undersigned counsel's trial schedule and the press of other deadlines, Defendants respectfully request a one-week enlargement of the deadline to file their response to the Distribution Motion. If the request is granted, the new deadline will be September 16, 2024.

5. Defendants' counsel conferred with counsel for the Receiver and was advised that the Receiver does not oppose the requested enlargement of time.

6. Defendants are seeking the requested enlargement due to the foregoing circumstances, and not for the purposes of delay. No party will be prejudiced if the enlargement is granted.

WHEREFORE, Defendants respectfully request an enlargement of time, up to and including September 16, 2024, to file their response to the Receiver's Distribution Motion.

S.D. Fla L. R. 7.1(a)(3) Certification of Counsel

Counsel for the Defendants hereby certify that they have conferred with counsel for the Receiver in a good faith effort to resolve the issues raised in this motion and are authorized to state that the Receiver has indicated the following: "Notwithstanding the requested extension of time, the Receiver will endeavor to draft and file his reply to the Defendants' response by the current deadline of September 23, 2024 [ECF No. 2015], so as not to delay the Court's resolution of the Distribution Motion and, on that basis, does not oppose the requested enlargement of time."

Respectfully submitted,

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By: /s/ David L. Ferguson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of September, 2024, I electronically filed the forgoing 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 transmissions of Notices of Electronic Filing generated by CM/ECF.

By: /s/ James M. Kaplan

JAMES M. KAPLAN