

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 REPLY TO CHEHEBARS' RESPONSE IN OPPOSITION
TO RECEIVER'S 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

his Reply to the Chehebars' Response in Opposition [ECF No. 2041] (the "Response") to the Receiver's Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution [ECF No. 2014] (the "Distribution Motion"), and states as follows:

1. The Chehebars filed their Response to the Distribution Motion on Monday, September 16, 2024.

2. Pursuant to this Court's Order dated September 6, 2024, "[t]he Receiver's reply in support of its Distribution Motion shall remain due on September 23, 2024 without prejudice to the Receiver seeking an extension of time if necessary." [ECF No. 2026].

3. In their Response, the Chehebars have advanced new arguments, including an argument that the lien Albert Vagnozzi filed on behalf of the noteholders who accepted the Exchange Offering is invalid. [ECF No. 2041 at 11-15].

4. Also due on September 23, 2024, are the Receiver's replies to the responses other claimants filed in opposition to the Distribution Motion. There are four other responses to which the Receiver is preparing replies. [See ECF Nos. 2028, 2031, 2032, 2033].

5. The Receiver has been working diligently on his reply to the arguments the Chehebars have asserted in their response. Due to the press of business, including preparing the replies to the four other pending responses to the Distribution Motion, which the Receiver will be filing today, the Receiver requires additional time to finalize his reply to the Chehebars' Response.

6. Accordingly, the Receiver respectfully requests that the Court grant the Receiver a four-day extension of time, through and including September 27, 2024, for the Receiver to file his Response to the Chehebars' Response.

LLC; and ALB Management, LLC; and the Receivership also includes the property located at 107 Quayside Dr., Jupiter FL 33477.

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 his reply to the Chehebar's Response to the Distribution Motion by four days, through and including September 27, 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 and counsel for the Chehebars regarding this motion, and certifies that the Securities and Exchange Commission and the Chehebars do not oppose the requested relief.

Dated: September 23, 2024

Respectfully Submitted,

**STUMPHAUZER KOLAYA
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 23, 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 REPLY TO CHEHEBARS' RESPONSE
IN OPPOSITION TO RECEIVER'S 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 Reply to Chehebars' Response in Opposition to Receiver's Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution, dated September 23, 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 reply to the Chehebars' Response in Opposition [ECF No. 2041] to the Receiver's Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution [ECF No. 2014], on or before September 27, 2024

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record