

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

Case No: 9:20-CV-81205

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

vs.

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

Defendants

**DEFENDANT, JOSEPH COLE BARLETA'S NOTICE OF APPEAL ORDER
RENDERED on DECEMBER 16, 2024 [D.E. 2078]**

COMES NOW, Defendant, Joseph Cole Barleta ("Cole") who files this Notice of Appeal Pertaining to this Court's [D.E. 2078] ORDER ON RECEIVER'S MOTION re: [D.E. 2014] Motion to Approve Proposed Plan of Distribution and Authorize First Interim Distribution; [D.E. 2047] Motion to Amend [D.E. 2014] Motion; [D.E. 2061] Motion to Amend [D.E. 2014] Motion; [D.E. 2070] Motion to Amend [D.E. 2014] Motion. The Order being appealed was rendered on December 16, 2024, and such the deadline for filing such an appeal is Wednesday, January 15, 2025.

The Lower Tribunal's Order is immediately appealable under 28 U.S. Code § 1292(a)(2), holding that the appellate courts have jurisdiction to hear appeals from:

"Interlocutory orders appointing receivers, or refusing orders to wind up receiverships or to take steps to accomplish the purposes thereof, such as directing sales or other disposals of property, . . ." (emphasis added).

DATED: January 15, 2025

Respectfully submitted,

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/s/ Andre G. Raikhelson
Andre G. Raikhelson, Esq.
Bar Number: 123657

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all counsel of record through the CM/ECF system.