

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

**CORRECTED¹ CAPITAL SOURCE'S NOTICE OF APPEAL ORDER RENDERED on
DECEMBER 16, 2024 [D.E. 2078]**

COMES NOW, CAPITAL SOURCE 2000, INC. 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,

¹ This Notice of Appeal is corrected. The party seeking appellate relief is not Joseph Cole Barleta, but Capital Source 2000, Inc.

By: Law Offices of Andre G. Raikhelson, LLC.
Counsel for Defendant, Joseph Cole Barleta
7000 W Palmetto Park Road
Suite 240
Boca Raton, FL 33433
Telephone: (954) 895-5566
Primary Email: arlaw@raikhelsonlaw.com

/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.