

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-CIV-81205-RAR**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

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

Defendants.

SECURED CHEHEBAR INVESTORS'

UNOPPOSED MOTION FOR EXTENSION OF TIME

GEMJ Chehebar GRAT, LLC, Albert Chehebar, Isaac Shehebar, Isaac Shehebar 2008 AIJJ Grantor Retained Annuity Trust, Michael Chehebar, Ezra Shehebar, Ezra Chehebar, Ezra Shehebar LLC, Cherie Chehebar, Josef Chehebar, Steven Chehebar, and Joyce Chehebar (collectively the "Secured Chehebar Investors" or "SCIs"), by and through undersigned counsel, move for a 10-day extension of time within which to respond to the Receiver's Motion to Approve the Settlement Agreement involving Eckert Seamans (the "Motion") (ECF No. 2081), and in support thereof state:

The Court has set a deadline of January 27, 2025, for any person who objects to the terms of the Settlement Agreement, the Optout Bar Order, the Motion, or any of the relief related to any of the foregoing, or requests exclusion from the Settlement Agreement, to file an objection or request for exclusion. ECF No. 2082.

The Receiver and SCIs are in ongoing discussions regarding concerns about the Settlement Agreement and are engaged to try and resolve them. The Receiver and SCIs have conferred and agree that an extension of 10 days is required to allow for these good faith discussions to continue

so that the Receiver and SCIs can continue to attempt to resolve these concerns without the need for further litigation.

As to the SCIs only, the SCIs request that the Court grant an extension of 10-days for the SCIs to respond to the Motion. The Receiver and SCIs have discussed the resulting timeline for pleadings and agree that the following would be applicable:

Deadline for SCIs to respond to Motion: February 6, 2025

Deadline for Receiver to respond to SCIs' pleading: February 17, 2025

I HEREBY CERTIFY that pursuant to the Local Rules I conferred with counsel for the Receiver concerning the relief requested herein. The Receiver does not oppose the relief requested herein.

WHEREFORE, the SCIs respectfully request this Court grant the SCIs a 10-day extension to respond to the Motion.

Dated: January 23, 2025.

Respectfully submitted,

s/ Marshall Dore Louis

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Defendants.

[PROPOSED]

ORDER GRANTING SECURED CHEHEBAR INVESTORS'

UNOPPOSED MOTION FOR EXTENSION OF TIME

THIS CAUSE comes upon the Unopposed Motion of GEMJ Chehebar GRAT, LLC, Albert Chehebar, Isaac Shehebar, Isaac Shehebar 2008 AIJJ Grantor Retained Annuity Trust, Michael Chehebar, Ezra Shehebar, Ezra Chehebar, Ezra Shehebar LLC, Cherie Chehebar, Josef Chehebar, Steven Chehebar, and Joyce Chehebar (collectively the "SCIs"), for a 10-day extension of time within which to respond to the Receiver's Motion to Approve the Settlement Agreement involving Eckert Seamans (ECF No. 2081). Having considered the Unopposed Motion of the SCIs, and for good cause shown therein, it is hereby:

ORDERED AND ADJUDGED that SCIs' Unopposed Motion is **GRANTED**.

As to the SCIs, the following deadlines now apply:

Deadline for SCIs to respond to the Receiver's Motion: February 6, 2025

Deadline for Receiver to respond to SCIs' pleading: February 17, 2025

DONE AND ORDERED in Miami, Florida, this ____ day of January 2025.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies Furnished:
All Counsel of Record