

**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 W. LAFORTE’S
UNOPOSED MOTION FOR EXTENSION OF TIME**

Defendants, LISA MCELHONE and JOSEPH W. LAFORTE (“Defendants”), by and through their undersigned counsel, move for a ten (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:

1. The Court has set a deadline of January 27, 2025, for any person “who objects to the terms of the Settlement Agreement, the Opt-out 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.

2. Due to the press of other business and deadlines, including, without limitation, the need for Ms. McElhone’s lead counsel, James Kaplan, to prepare for and attend an all-day mediation conducted on today’s date, counsel for the Defendants require a ten (10) day extension to file their objections and request for exclusion with respect to the proposed Settlement Agreement and Opt-out Bar Order.

3. Counsel for the Receiver and the Defendants have conferred regarding Defendants' request for an extension and the grounds for Defendants' objections. The Receiver has advised that he does not oppose the requested extension, but Eckert Seamans (which is a party to proposed settlement, but not a movant) does object.

4. Defendants and the Receiver intend to continue conferring on the Defendants' objections to the Settlement Agreement. Assuming the Defendants ultimately file an objection and/or request for exclusion, Defendants request that the timeline for briefings on the Motion be modified as follows:

Deadline for the Defendants to file a Response to the Motion: February 6, 2025

Deadline for the Receiver to file a Reply to the Defendants' Response: February 17, 2025

WHEREFORE, Defendants LISA MCELHONE and JOSEPH W. LAFORTE respectfully request this Court grant the Defendants a ten (10) day extension to respond to the Motion, and grant such other relief as the Court deems appropriate.

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

Counsel for the Defendant 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 does not oppose the requested enlargement of time.

Respectfully submitted,

**KOPELOWITZ OSTROW
FERGUSON WEISELBERG GILBERT**
Attorneys for Defendant Joseph W. LaForte
One W. Las Olas Blvd., Suite 500
Fort Lauderdale, Florida 33301
Tel: (954) 525-4100

By: /s/ David L. Ferguson
DAVID L. FERGUSON
Florida Bar Number: 0981737
Ferguson@kolawyers.com

KAPLAN ZEENA LLP
Attorneys for Defendant Lisa McElhone
2 South Biscayne Boulevard, Suite 3050
Miami, Florida 33131
Telephone: (305) 530-0800
Facsimile: (305) 530-0801

By: /s/ Noah E. Snyder
JAMES M. KAPLAN
Florida Bar No.: 921040
james.kaplan@kaplanzeena.com
elizabeth.salom@kaplanzeena.com
service@kaplanzeena.com
NOAH E. SNYDER
Florida Bar No.: 107415
noah.snyder@kaplanzeena.com
maria.escobales@kaplanzeena.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of January, 2025, 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/ Noah E. Snyder
NOAH E. SNYDER

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Defendants.

_____ /

**[PROPOSED] ORDER GRANTING DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION OF TIME**

THIS CAUSE comes upon the Unopposed Motion of LISA MCELHONE and JOSEPH W. LAFORTE (the "Defendants") for a ten (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 Defendants, and for good cause shown therein, it is hereby

ORDERED AND ADJUDGED that the Defendants' Unopposed Motion is **GRANTED**.

As to the Defendants the following deadlines now apply:

Deadline for the Defendants to respond to the Motion: February 6, 2025

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

DONE AND ORDERED in Miami, Florida, this ___ day of _____, 2025.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record