

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 20-CV-81205-RAR/REINHART

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

Defendants.

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**PACIFIC LIFE INSURANCE COMPANY'S UNOPPOSED  
MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO  
THE RECEIVER'S MOTION FOR AN ORDER TO SHOW CAUSE**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1 of the Local Rules of Court for the Southern District Florida, Pacific Life Insurance Company ("Pacific Life") hereby moves, unopposed, for an enlargement of time to file its response to Receiver's Motion for an Order to Show Cause Why Pacific Life Should not be Held in Contempt [ECF No. 2127] (the "Receiver's Motion"). In support of the requested enlargement, Pacific Life states the following:

1. On March 21, 2025, Receiver, Ryan K. Stumphauzer (the "Receiver") filed a Motion seeking an order from the Court for Pacific Life to show cause why it should not be held in contempt for allegedly dissipating and/or interfering with a purported Receivership Asset, namely a life insurance policy that lapsed by its terms for failure to pay premiums. *See* Receiver's Motion [ECF No. 2127].

2. On March 28, 2025, the Court entered its Order granting the Receiver's Motion. *See* Order [ECF No. 2130]. According to the Order, Pacific Life's response to the Receiver's

Motion is due to be filed on April 11, 2025. The Receiver's reply is due to be filed on April 18, 2025. The Court's Order also set an in-person evidentiary hearing on the Receiver's Motion for April 22, 2025. *Id.*

3. For the reasons set forth below, Pacific Life respectfully requests an extension of time to respond to the Receiver's Motion through and including April 25, 2025. Good cause exists for Pacific Life's requested enlargement as follows:

a. Pacific Life is currently collecting documents relating to the life insurance policy, which is the subject of the Receiver's Motion. These documents are necessary for Pacific Life to demonstrate to the Court why the life insurance policy was not subject to the Amended Order Appointing Receiver [ECF No. 141], and consequently why Pacific Life should not be held in civil contempt for the purported violation of that Order. The document collection effort, however, is taking considerably more time than previously anticipated given that the life insurance policy lapsed according to its terms almost five years ago, in October 2020.

b. Pacific Life also needs additional lead-time to prepare its potential witnesses, and ensure they will be available for cross-country travel from Newport Beach, California to Miami, Florida, for the eventual evidentiary hearing contemplated by the Court's Order.

c. Undersigned counsel also respectfully requests the enlargement due to the press of other matters, including various deadlines and hearings in other matters such as *Romano v. Allianz Life Ins. Co. of N.A., et al.*, Case No. 2024-CA-1857 NC (Fla. Cir. Ct.) and *Munzer v. Ziff, et al.*, Case No. 2022 CA 003231 NC (Fla. Cir. Ct.).

4. As a result of the foregoing, Pacific Life respectfully requests an enlargement of time through and including April 25, 2025 to respond to the Receiver's Motion, with any reply by

the Receiver due by May 2, 2025. Following the conclusion of the briefing, Pacific Life respectfully requests that an in-person evidentiary hearing be held on a date and time convenient for the Court, but with sufficient time for Pacific Life to ensure that its witnesses are prepared and able to travel from California to Florida for the hearing.

5. The requested extension will permit Pacific Life and its counsel an adequate opportunity to investigate the allegations in the Receiver's Motion, and prepare an appropriate response demonstrating why Pacific Life should not be held in civil contempt. The requested enlargement will also allow Pacific Life to prepare its potential witnesses and ensure their respective availabilities for cross-country travel to the in-person evidentiary hearing before the Court.

6. Counsel for the Receiver have graciously informed Pacific Life that they have no objection to the enlargement of time requested in this motion.

7. This request for an enlargement of time is reasonable, made in good faith, supported by good cause, and not interposed for delay or any other improper purpose. The request extension will not prejudice any party or non-party.

8. This is Pacific Life's first request for an extension of time relating to the Receiver's Motion.

WHEREFORE, Pacific Life respectfully requests that the Court enter an order granting an enlargement of time until April 25, 2025 for Pacific Life to respond to the Receiver's Motion, with any reply by the Receiver due by May 2, 2025. Pacific Life also respectfully requests that an in-person evidentiary hearing be scheduled for a date and time convenient for the Court, but with sufficient time for Pacific Life to ensure that its witnesses are prepared on the matter and able to

travel from California to Florida for the hearing. A proposed order will be emailed to the Court's ECF mailbox in connection with this motion.

**CERTIFICATE OF CONFERRAL**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for Pacific Life has conferred with the Receiver's counsel regarding the relief requested by this motion. The Receiver's counsel graciously advised that it does not oppose the requested relief.

Dated: April 9, 2025

Respectfully submitted,

/s/ Todd M. Fuller

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*Counsel for Pacific Life Insurance Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 9, 2025, 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/ Todd M. Fuller

Todd M. Fuller

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Defendants.

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**ORDER ON PACIFIC LIFE INSURANCE COMPANY'S  
UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

THIS CAUSE comes before the Court on Pacific Life Insurance Company's Unopposed Motion for Enlargement of Time to respond to Receiver, Ryan K. Stumphauzer's Motion for an Order to Show Cause Why Pacific Life Should not be Held in Contempt [ECF No. 2127] (the "Receiver's Motion"). The Court having considered the Motion, and for good cause shown, it is hereby **ORDERED AND ADJUDGED** as follows:

1. Pacific Life Insurance Company's Unopposed Motion is **GRANTED**.
2. Pacific Life shall have until April 25, 2025 to file its response to the Receiver's Motion, with any reply by the Receiver due by May 2, 2025.
3. The Court will schedule an in-person evidentiary hearing for a date and time convenient for the Court, but with sufficient time for Pacific Life to prepare its witnesses on the matter and ensure availability to travel from California to Florida for the hearing.

**SO ORDERED.**

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THE HONORABLE RODOLFO A. RUIZ, II  
United States District Court Judge