

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.

**SECOND JOINT STATUS REPORT OF RECEIVER, RYAN K.
STUMPHAUZER, ESQ. AND PACIFIC LIFE INSURANCE COMPANY**

Receiver, Ryan K. Stumphauzer, Esq. (the “Receiver”) and Pacific Life Insurance Company (“Pacific Life”) respectfully submit this Second Joint Status Report and state as follows:

1. On May 6, 2025, the Receiver and Pacific Life informed the Court by telephonic conference that they intended to enter into a joint stipulation regarding the facts contained in the Receiver’s Motion for an Order to Show Cause Why Pacific Life Should not be Held in Contempt [ECF No. 2127] and Pacific Life’s Response in Opposition to the Receiver’s Motion [ECF No. 2138]. The parties also informed the Court that they intended to confer as to the necessity of further proceedings regarding the Receiver’s Motion.

2. Following the parties’ telephonic conference, the Court entered a paperless Order requiring the parties to file a Joint Status Report informing the Court as to whether further proceedings were needed with respect to the Receiver’s Motion, by May 20, 2025. Paperless Order [ECF No. 2144].

3. On May 20, 2025, the parties filed the Joint Status Report advising the Court that they were continuing to confer regarding the issues raised in the Receiver's Motion and would submit a Second Joint Status Report on or before May 27, 2025, to advise the Court of the necessity of further proceedings. Joint Status Report [ECF No. 2149].

4. On May 20, 2025, the Court entered a paperless Order requiring the parties to file a Second Joint Status Report informing the Court as to whether further proceedings were needed with respect to the Receiver's Motion, by May 27, 2025. Paperless Order [ECF No. 2150].

5. In accordance with the Court's May 27, 2025 paperless Order, the parties respectfully advise the Court that they are continuing to confer regarding the issues raised in the Receiver's Motion. Specifically, Pacific Life requires additional time to work through a number of issues raised by the Receiver's Motion in an attempt to resolve the matter without further Court intervention, if possible.

6. The Receiver and Pacific Life would propose submitting a Third Joint Status Report to the Court on or before June 3, 2025, advising the Court of the parties' ongoing progress and whether further proceedings are necessary.

Dated: May 27, 2025

Respectfully submitted,

/s/ Todd M. Fuller

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 27, 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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