

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.

**THIRD 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 20, 2025 paperless Order, the parties submitted their Second Joint Status Report on May 27, 2025, advising the Court that they were continuing to confer regarding the issues raised in the Receiver's Motion. Second Joint Status Report [ECF No. 2155]. Specifically, the parties informed the Court that Pacific Life required additional time to address a number of issues raised by the Receiver's Motion in an attempt to resolve the matter without further Court intervention.

6. On May 27, 2025, the Court entered a paperless Order requiring the parties to file a Third Joint Status report by June 3, 2025, advising the Court as to whether further proceedings were needed with respect to the Receiver's Motion. Paperless Order [ECF No. 2156].

7. In accordance with the Court's May 27, 2025 paperless Order, the parties respectfully advise the Court that they are attempting to resolve the issues raised by the Receiver's Motion, but need additional time to complete discussions. In particular, Pacific Life is awaiting additional information from a reinsurance entity regarding the lapsed life insurance policy that is the subject of the Receiver's Motion. Pacific Life anticipates receiving the information this week, which it believes will facilitate a resolution to this matter. In the interim, however, Pacific Life

needs additional time to receive and process this information to continue meaningful discussions with the Receiver.

8. The Receiver and Pacific Life would propose submitting a Fourth Joint Status Report to the Court on or before June 10, 2025, advising the Court of the parties' ongoing progress and whether further proceedings are necessary. Pacific Life states that the Receiver has been extremely gracious in accommodating Pacific Life's requests for additional time while the parties attempt to resolve these issues.

Dated: June 3, 2025

Respectfully submitted,

/s/ Todd M. Fuller

Todd M. Fuller (Fla. Bar. No. 666211)
CARLTON FIELDS, P.A.
2 MiamiCentral, Suite 1200
700 NW 1st Avenue
Miami, Florida 33136
Telephone: (305) 530-0050
Facsimile: (305) 530-0055
tfuller@carltonfields.com

*Counsel for Pacific Life
Insurance Company*

/s/ Timothy A. Kolaya

Timothy A. Kolaya (Fla. Bar. No. 056140)
STUMPHAUZER KOLAYA
NADLER & SLOMAN, PLLC
Two South Biscayne Blvd., Suite 1600
Miami, FL 33131
Telephone: (305) 614-1400
Facsimile: (305) 614-1425
tkolaya@sknlaw.com

Co-Counsel for Receiver

/s/ Douglas K. Rosenblum

Gaetan J. Alfano (*Pro Hac Vice*)

Douglas K. Rosenblum (*Pro Hac Vice*)

PIETRAGALLO GORDON ALFANO

BOSICK & RASPANTI, LLP

1818 Market Street, Suite 3402

Philadelphia, PA 19103

Telephone: (215) 320-6200

Facsimile: (215) 981-0082

GJA@Pietragallo.com

DKR@Pietragallo.com

Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 3, 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

140018967