

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 9:20-CV-81205-RAR

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants.

_____ /

Unopposed Motion to Withdraw as Counsel

Francis D. Murray, Esq., co-counsel for Receiver Ryan K. Stumphauzer of the Receivership Entities (“Receiver”), pursuant to Local Rule 11.1(d)(3)(A), hereby files this Motion to Withdraw, and in support states:

1. Francis D. Murray is no longer with the firm Stumphauzer Kolaya Nadler & Sloman, PLLC (“SKN”), and has moved to a new firm that does not represent the Receiver.
2. SKN will continue to represent the Receiver in this case.

WHEREFORE, based on the foregoing, Francis D. Murray respectfully requests that this Court enter an Order allowing him to withdraw as counsel of record in this matter and relieving him of all duties in this case.

CERTIFICATE OF CONFERRAL

I certify that prior to filing this motion, pursuant to Rule 7.1(a)(3), I conferred with counsel for the Securities and Exchange Commission, which does not oppose the motion.

Dated: May 28, 2026

Respectfully submitted,

/s/ Francis D. Murray

Francis D. Murray

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CERTIFICATE OF SERVICE

I certify that on May 28, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

s/ Francis D. Murray

Francis D. Murray

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COMPLETE BUSINESS SOLUTIONS
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Defendants.

_____ /

**[PROPOSED] ORDER ON FRANCIS D. MURRAY’S MOTION TO WITHDRAW AS
CO-COUNSEL FOR RECEIVER OF THE RECEIVERSHIP ENTITIES**

THIS CAUSE came before the Court on attorney Francis D. Murray, Esq.’s Motion to Withdraw as Co-Counsel for Receiver Ryan K. Stumphauzer of the Receivership Entities (the “Motion”) [ECF No.]. Being fully advised, it is

ORDERED AND ADJUDGED that the Motion is **GRANTED**. Francis D. Murray, Esq. is relieved of all counsel duties in this case. The Clerk is hereby ordered to terminate attorney Francis D. Murray, Esq. as counsel for the Receiver.

DONE AND ORDERED in Miami, Florida, this ____ day of May, 2026.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: counsel of record