

**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.

**RECEIVER, RYAN K. STUMPHAUZER'S THIRTY-SIXTH MOTION TO LIFT
LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,¹ by and through undersigned counsel, hereby files this Thirty-Sixth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings, and states as follows:

**I. MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN
GARNISHMENT PROCEEDINGS**

1. The Receiver hereby moves this Court to lift the Litigation Injunction for the limited purpose of allowing the Receiver, in his discretion, to dissolve current writs of

¹ The "Receivership Entities" are Complete Business Solutions Group, Inc. d/b/a Par Funding ("Par Funding"); ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; Fast Advance Funding LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consulting, Inc.; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; and Contract Financing Solutions, Inc.

garnishment, to mark judgments satisfied, and/or to open confessed judgments, where the counterparty merchant either has resolved, or has agreed to resolve prior defaults, or otherwise filed for bankruptcy protection, in the following cases in the Court of Common Pleas of Philadelphia County, Pennsylvania.²

2. The cases are:

- a. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Stone Tyndall LLC d/b/a Stone Tyndall d/b/a 37th and Zen d/b/a 37th & Zen: d/b/a Stone – Tyndall; and Annette Stone*, Philadelphia Court of Common Pleas, Docket No. 190804485.
- b. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Houir Diner Inc d/b/a Michael's Diner d/b/a Michaels's Family Restaurant d/b/a Michael's Restaurant and Ahmad Houir*, Philadelphia Court of Common Pleas, Docket No. 180105025.
- c. *Complete Business Solutions Group, Inc. d/b/a Par Funding and Fast Advance Funding LLC v. Government Data Resources, LLC and Norman Kanefsky*, Philadelphia Court of Common Pleas, Docket No. 151203068.
- d. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Access Pharmacies Inc. d/b/a Des Moines Pharmacy*, Philadelphia Court of Common Pleas, Docket No. 190804483.
- e. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. 424 Trucking LLC and Terrance Ruff*, Philadelphia Court of Common Pleas, Docket No. 190607135.
- f. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Catapulting Change LLC and Kenneth William Bryant*, Philadelphia Court of Common Pleas, Docket No. 190802249.
- g. *Contract Financing Solutions Inc. v. Norton Auto Sales LLC and Eric Norton*, Philadelphia Court of Common Pleas, Docket No. 191203076.
- h. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Southern Cabinet Works Inc and Jeffrey Todd*, Philadelphia Court of Common Pleas, Docket No. 200101511.

² See the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] (the "Operative Receivership Order"). The Receiver generally incorporates the background section of his prior Motions to Lift Litigation Injunction as to Certain Garnishment Proceedings. [See, e.g., ECF No. 111.]. To conserve resources and promote efficiency, the Receiver is providing only a summary narrative, as approved by the Court at the October 7, 2020, status conference.

3. The Receiver has determined, in his professional judgment, that it is in the best interests of the Receivership Estate to dissolve current writs of garnishment, to mark judgments satisfied, and/or to open confessed judgments with respect to these cases.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant the motion and lift the Litigation Injunction on a limited basis as set forth above. A proposed order for the Court's consideration is attached as Exhibit 1.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with all counsel of record and unrepresented parties in this matter regarding the relief sought through this motion and certifies that all counsel of record and unrepresented parties have either: (1) not responded to the Receiver's meet and confer requests; or (2) confirmed that their clients either do not oppose or take no position with respect to the relief sought. The SEC does not oppose the motion to lift the litigation injunction.

Dated: September 4, 2026

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 4, 2026, 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/ Timothy A. Kolaya
TIMOTHY A. KOLAYA

EXHIBIT 1

**UNITED STATES DISTRICT COURT
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Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUSER'S
THIRTY-SIXTH MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN
GARNISHMENT PROCEEDINGS**

THIS CAUSE comes before the Court upon the Receiver's Thirty-Sixth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings [ECF No. ____] ("Motion"), filed on September 4, 2026.

In the Motion, the Receiver seeks to modify the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141], so as to lift the litigation injunction provided for in that Order for certain garnishment matters currently pending in the Court of Common Pleas of Philadelphia County, Pennsylvania to be opened for the limited purpose to authorize the Receiver, in his direction, to dissolve current writs of garnishment, to mark judgments satisfied, and/or to reopen confessed judgments, where the counterparty merchant either has resolved, has agreed to resolve prior defaults, or otherwise filed for bankruptcy protection, in certain cases in the Court of Common Pleas of Philadelphia County, Pennsylvania.

The Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

ORDERED AND ADJUDGED that Receiver's Motion is **GRANTED** with respect to the relief requested. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] is hereby lifted in the following matters in the Court of Common Pleas of Philadelphia County, Pennsylvania, and solely for the purpose as described in the Motion:

- a. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Stone Tyndall LLC d/b/a Stone Tyndall d/b/a 37th and Zen d/b/a 37th & Zen: d/b/a Stone – Tyndall; and Annette Stone*, Philadelphia Court of Common Pleas, Docket No. 190804485.
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- c. *Complete Business Solutions Group, Inc. d/b/a Par Funding and Fast Advance Funding LLC v. Government Data Resources, LLC and Norman Kanefsky*, Philadelphia Court of Common Pleas, Docket No. 151203068.
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- h. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Southern Cabinet Works Inc and Jeffrey Todd*, Philadelphia Court of Common Pleas, Docket No. 200101511

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

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record