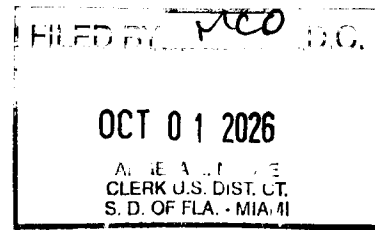


Robert & Marie McNicholl
280 N Utica Ave. Massapequa, NY 11758
9/26/2026



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO.
9:20-CV-81205 RAR
PRO SE EMERGENCY FOR EXTENSION OF TIME
WILKIE D. FERGUSON, JR. UNITED STATES COURTHOUSE 400 NORTH MIAMI
AVENUE, ROOM 8N09 MIAMI, FL. 33128

To Whom It May Concern:

SECURITIES AND EXCHANGE COMMISSION, Plaintiff V. COMPLETE BUSINESS SOLUTIONS GROUP, INC., et al., Defendants. PRO SE EMERGENCY MOTION FOR EXTENSION OF TIME TO RESPOND TO RECEIVER'S MOTION TO APPROVE RECOMMENDED DISALLOWANCE OF LATE-FILED CLAIMS (D.E. 2239) AND BRIEFING SCHEDULE (D.E. 2243).

COMES NOW, Robert W. McNicholl and Marie McNicholl joint investors and Marie McNicholl individual investor in AGM Capital Fund I, LLC (the "AGM FUNDS"), appearing pro se, and respectfully moves this Honorable Court for an extension of time to respond to Receivers Ryan K. Stumphauzer's Motion to Approve Recommended Disallowance of Late-Filed Claims from Individual Investors in AGM Capital Fund I, LLC and AGM Capital Fund II, LLC (D.E. 2239) and the corresponding Order Setting Briefing Schedule (D.E. 2243). In support of this Motion, Movant respectfully states as follows: 1. BACKGROUND AND LACK OF DIRECT NOTICE: Movants are joint retail investors (Husband & Wife) who suffered substantial financial losses through the AGM Funds managed by Vincent Camarda and A.G. Morgan. Although Mr. Camarda and A.G. Morgan were subpoenaed by the Court and previously provided investor records, Movants were never directly served or notified by the Receiver or the Court regarding the Par Funding receivership claims process, proof of claim forms, or applicable bar dates. 2. Sequence of Belated Notice Regarding Pending Motion: On September 25, 2026, Movants received an email indicating that the deadline to respond has changed. No other prior email had been received. It further stated that the Receiver had moved to disallow AGM Fund investor claims and that a formal briefing

schedule had been established. Prior to this communication, Movants were completely unaware that the Receiver had moved to disallow AGM Fund investor claims or that a formal briefing schedule had been set by this court. 3. Widespread Lack of Notice Among Known Victims: As of September 25, 2026, numerous retail investors in AGM Fund I and AGM Fund II remain completely unaware of these proceedings and the pending Motion to Disallow (D.E. 2239). The failure to receive timely notice was entirely beyond the control of the affected investors and directly attributable to a systemic breakdown in direct notice to known, subpoenaed victims.

4. Application of the Pioneer Excusable Neglect Factors: Under the well-established equitable framework set forth in *Pioneer Investment Services Co. v. Brunswick Associates Ltd.*, 507 U.S. 380 (1993), any delay in participating in these proceedings or responding to the Receiver's motion constitutes excusable neglect. All four Pioneer factors strongly favor granting an extension of time: Factor 1: Danger of Prejudice to the Debtor/Receivership Estate: Granting a brief extension of time will not prejudice the Receivership Estate or its administration. The administration remains active, and permitting defrauded retail investors time to file a response will not disrupt the overall proceedings or delay distributions in a manner that prejudices other creditors. Factor 2: Length of Delay and Its Potential Impact on Judicial Proceedings: Movants filed this motion immediately-within 24 hours of receiving actionable details and filing instructions on September 25, 2026. The length of the requested extension is minimal and will have zero adverse impact on judicial efficiency or the Court's calendar. Factor 3: Reason for Delay and Whether It Was Within Reasonable Control: The delay in responding and submitting claims was caused entirely by a total absence of direct notice and was completely outside the control of Movants and fellow AGM Fund investors. Known victims were not provided direct notice of the claims bar date, making compliance with uncommunicated deadlines impossible. Factor 4: Good Faith of the Movants: Movants have acted in complete good faith at all times. Upon receiving actionable information regarding D.E. 2239 and D.E. 2243, Movants acted with utmost diligence to notify the Court. This motion is brought solely to preserve fundamental due process rights and is not intended to cause undue delay.

5. Relief Requested: Denying an extension would result in severe, irreparable harm by permanently barring defrauded retail investors from seeking recovery without giving them a meaningful opportunity to be heard. An extension is necessary to afford affected AGM Fund investors sufficient time to consult legal counsel, review the Receiver's legal positions, and submit an appropriate response. WHEREFORE, Movants respectfully request that this

Honorable Court enter an Order granting an extension of time to respond to the Receiver's Motion (D.E. 2239) and providing such other and further relief as the Court deems just and proper. Respectfully submitted, Dated September 26, 2026 Robert McNicholl
SgtBob5@aol.com 917-374-4612 Marie McNicholl McnichollBroker@aol.com 516-455-2952

For any additional information, please do not hesitate to reach out.

Best regards,

Robert & Marie McNicholl
Marie McNicholl
Robert & Marie McNicholl

*SECURITIES AND EXCHANGE COMMISSION V. COMPLETE BUSINESS
SOLUTIONS GROUP, INC. D/B/A PAR FUNDING, ET AL.,
CASE NO. 20-CV-81205-RAR (S.D. FLA.).*

A.G. MORGAN

Robert & Marie McNicholl

Summary of Fund Interest: 4/25/2025

Name of Account	Initial Start Date	Maturity Date	Balance	Monthly Interest	Total Interest in Arrears through April 25, 2025	Interest to Maturity	Total through Maturity
Joint: AGNI Capital Fund I - NQ - 12% - 12 month term	4/25/2019	5/2/2026	\$100,000.00	\$1,000.00	\$18,000.00	\$12,000.00	\$130,000.00
Marie: AGNI Capital Fund I - CamaPlan IRA (1) - 12% - 12 month term	1/10/2020	1/17/2026	\$49,250.00	\$492.50	\$8,272.50	\$4,432.50	\$61,955.00
Marie: OMNI Diversified Fund - CamaPlan IRA (2) - 9% - 18 month term	10/25/2022	11/2/2025	\$11,000.00	\$82.50	\$1,815.00	\$495.00	\$13,310.00
Robert: OMNI Diversified Fund - CamaPlan IRA (1) - 9% - 18 month term	6/25/2020	7/2/2026	\$240,500.00	\$1,803.75	\$32,467.50	\$25,252.50	\$298,220.00
Robert: OMNI Diversified Fund III - CamaPlan IRA (2) - 9% - 6 month term	11/10/2023	5/17/2025	\$100,000.00	\$750.00	\$13,500.00	\$750.00	\$114,250.00
Total			\$500,750.00	\$4,128.75	\$74,055.00	\$42,930.00	\$617,735.00

This summary statement is in addition to any or all statements you receive from your custodian and/or any non-propritiary companies. This summary was prepared manually by your advisor A.G. Morgan Financial Advisors, LLC to provide an estimated overview of your account values and its content may not be accurate. You must rely on the statements you receive directly from the investment companies. Market values do not include any fees, charges or incorporate any tax consequences that may be taken at the time of redemption or liquidation.

Alternative investment products, including notes & debentures, involve a high degree of risk, often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be highly illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as mutual funds and the underlying investments are not transparent and are known only to the investment manager. Alternative investment performance can be volatile. An investor could lose all or a substantial amount of his or her investment. There may be restrictions on transferring interests in any alternative investment. Illiquid Private Placement investment products traded herein are not FDIC insured or bank guaranteed and may lose value. Past performance is not indicative of future results. A.G. Morgan, and its employees do not provide any tax, accounting or legal advice. You should always consult with a qualified professional in those specific areas for your investment needs. Investment Advisory Services offered through A.G. Morgan Financial Advisors, LLC, a SEC Registered Investment Advisor. Sources used to prepare this summary were:

Account values are shown as of: 4/25/2025

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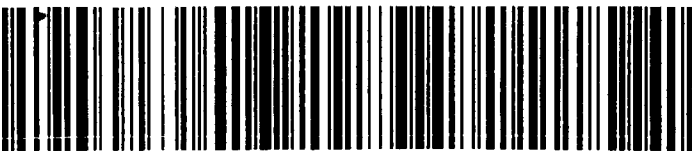
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