

**UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE
NO. 9:20-CV-81205-RAR**

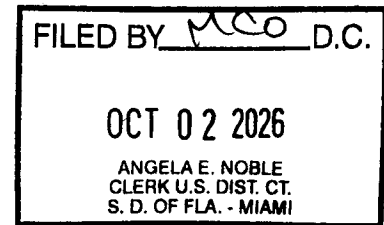
SECURITIES AND EXCHANGE COMMISSION,

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 ORDER (D.E. 2243)

COMES NOW, William T Styne, an individual investor in AGM Capital Fund I, LLC , appearing *pro se*, and respectfully moves this Honorable Court for an extension of time to respond to Receiver 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:** Movant is an individual retail investor 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, Movant was 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:**
 - o On September 23, 2026, Movant received a vague third-party email indicating generally that the Receiver had moved to disallow AGM Fund investor claims and that a formal briefing schedule had been established. However, this initial communication omitted essential procedural details—including docket numbers, court venue, presiding judge, and instructions on how or where to file a response.
 - o On September 24, 2026, at approximately 2:20 PM, Movant received a follow-up third-party email containing specific instructions and referencing Docket Entry 2239 and Docket Entry 2243 for the first time.
 - o Prior to these third-party communications, Movant was 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:
 - o **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.
 - o **Factor 2: Length of Delay and Its Potential Impact on Judicial Proceedings:** Movant filed this motion immediately—within 24 hours of receiving actionable details and filing instructions on September 24, 2026. The length of the requested extension is minimal and will have zero adverse impact on judicial efficiency or the Court's calendar.
 - o **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 Movant and fellow AGM Fund investors. Known victims were not provided direct notice of the claims bar date, making compliance with uncommunicated deadlines impossible.
 - o **Factor 4: Good Faith of the Movant:** Movant has acted in complete good faith at all times. Upon receiving actionable information regarding D.E. 2239 and D.E. 2243, Movant 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, Movant respectfully requests 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

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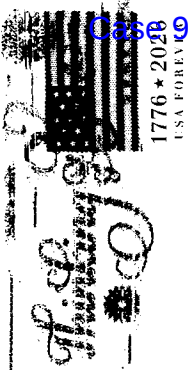
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MIAMI, FL 33128

33128-180549

REC'D BY _____ D.C.
OCT 02 2026
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