

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

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.

**FOX ROTHSCHILD LLP's MOTION TO WITHDRAW AS COUNSEL
FOR COMPLETE BUSINESS SOLUTIONS GROUP, INC. AND
FULL SPECTRUM PROCESSING, INC.**

Pursuant to S.D. Fla. Local Rules 11.1(d)(3)(A), undersigned counsel respectfully requests the Court enter an order granting the withdrawal of Fox Rothschild LLP, and attorneys Joseph A. DeMaria, Robert F. Elgidely, Alex L. Braunstein, and Brett Berman, as counsel for Complete Business Solutions Group, Inc. and Full Spectrum Processing, Inc. ("Corporate Defendants") and state as follows:

1. On July 27, 2020, Joseph A. DeMaria, Robert F. Elgidely and Alex L. Braunstein of Fox Rothschild LLP filed their Notices of Appearance in this case on behalf of Corporate Defendants Complete Business Solutions Group, Inc. ("CBSG") and Full Spectrum Processing, Inc. ("Full Spectrum"). On July 28, 2020, Brett Berman filed a Motion to Appear *Pro Hac Vice* [ECF No. 37], and an Order Granting that Motion was entered by the Court on July 29, 2020 [ECF No. 44].

FOX ROTHSCHILD LLP

2. On August 13, 2020, the Court entered its Amended Order Appointing Receiver, ECF 141. Among other provisions, the Amended Order terminates all attorneys of the Corporate Defendants.

3. Pursuant to Local Rule 11.1, notice of this motion to withdraw as counsel was provided to counsel for the Receiver, who pursuant to the Amended Order, now represents the interests of the Corporate Defendants.

WHEREFORE, Fox Rothschild LLP and Joseph A. DeMaria, Brett Berman, Robert F. Elgidely and Alex L. Braunstein, respectfully request the Court to enter an Order granting their withdrawal as counsel in this case on behalf of CBSG and Full Spectrum. Undersigned counsel is submitting a proposed Order granting this Motion to the Court.

Respectfully submitted,

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By: /s/ Joseph A. DeMaria
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CERTIFICATE OF SERVICE

I hereby certify that on **August 14, 2020**, I electronically filed the foregoing with the Clerk of the Court using CM/ECF.

/s/ Joseph A. DeMaria
Joseph A. DeMaria