

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

20-cv-81205-RAR

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants.

**DEFENDANTS' MOTION FOR
ENLARGEMENT OF TIME TO FILE AN ANSWER**

Defendants Lisa McElhone, Joseph Cole Barleta, Joseph W. LaForte, Perry Abbonizio, and Michael C. Furman, and Relief Defendant The L.M.E. 2017 Family Trust (collectively, “Defendants”), move pursuant to Fed. R. Civ. P. 6(b) for an additional one (1) week enlargement of time to file an Answer to Plaintiff’s Amended Complaint for Injunctive and Other Relief (DE 119). In support, Defendants state as follows:

1. On August 10, 2020, Plaintiff filed an Amended Complaint for Injunctive and Other Relief (DE 119).
2. The deadline to answer or respond to the Amended Complaint is October 26, 2020.
3. Despite its nearly 300 paragraphs, the Amended Complaint alleges a scheme involving multiple individual and corporate defendants that fails to state its numerous claims

with sufficient particularity or to provide this Court with subject matter jurisdiction over this action.

4. In addition to the complexity of this matter and the various deficiencies in the Amended Complaint, the undersigned counsel have conferred and concluded that there are numerous issues common to the parties that would be more efficiently presented in their respective motions if they had additional time to coordinate before filing. The additional time requested will provide Defendants an opportunity to work together to avoid duplicative arguments. The net effect will conserve Court resources.

5. This is Defendant's first request for an enlargement of time to respond to the Complaint and is made in good faith for the reasons described herein.

WHEREFORE, Defendants respectfully request that this Court grant their motion for a one (1) week enlargement of time to file their Answer to the Plaintiff's Amended Complaint for Injunctive and Other Relief, up to and including November 2, 2020.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has attempted to confer with the parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues. The undersigned has conferred with counsel for the SEC, who opposes this motion.

Respectfully submitted,

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