

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:20-cv-81205-RAR
Referred to Magistrate Judge Reinhart

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

**NON-PARTIES, ECKERT SEAMANS CHERIN & MELLOTT, LLC
AND JOHN W. PAUCIUOLO, NOTICE OF COMPLIANCE WITH COURT ORDER
DIRECTING SERVICE OF CONFIDENTIALITY DESIGNATIONS**

Non-Parties, Eckert Seamans Cherin & Mellott, LLC (“Eckert Seamans”) and John W. Pauciulo (“Mr. Pauciulo”) (together, the “Deponents”), submit this Notice of Compliance with this Court’s April 23, 2021, order directing the Deponents to provide the SEC with notice of those portions of deposition transcripts they seek to designate as confidential. (ECF No. 555).

On April 28, 2021, Deponents provided SEC counsel with its Confidentiality deposition designations. On April 29, 2021, in response to the SEC’s request for additional information, Deponents provided detailed page and line descriptions and further explanations of the reasons for the designations.

As the designations indicate, there are minimal assertions in each transcript (11 total over the 331 pages of Mr. Pauciulo’s deposition; 4 total in the 231 pages of the 30(b)(6) deposition). Deponents explained that they asserted confidentiality in good faith on behalf of clients who have not waived privilege out of an abundance of caution and so that they do not run afoul of the law firm’s professional responsibilities to those clients. Deponents’ counsel has also

offered to provide further information when Deponents confer with the SEC today at 3:30pm.

Further, in light of developments this week, including Mr. Vagnozzi apparently waiving his assertion of privilege, Deponents have offered to resume those depositions to answer those questions. As such, Deponents believe most of the privilege challenges are moot.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic transmission via this Court's CM/ECF filing system on the 29th day of April, 2021, on all counsel or parties who have appeared in the above-styled action.

/s/Melanie E. Damian

Melanie E. Damian