

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
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.

FILED BY CRS D.C.
MAY 25 2021
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - W.P.B.

**[PROPOSED] Protective Order to Reschedule Deposition of Michael Furman on Wednesday
May 26th 2021**

THIS CAUSE comes before the court to ask the court to please intervene and postpone my deposition scheduled for May 26th 2021 because I have tried repeatedly to reschedule with opposing council who has denied my requests and refused to set up a new date despite my pleading. I have also had no action or response to the return of my laptop (and phone). Both myself and through my previous council were told they would be returned in January 2021. My previous council had instructed them the laptop and phone were needed in order to prepare and be visually present on my deposition. I do not feel comfortable in attending the deposition without proper council present. I have been working nonstop through illnesses to obtain new council as I was forced to move forward prose this past month. I have been in continual meetings, consultations, and calls with potential new councils and am currently speaking with a few new potential attorneys with meetings ending as recently as this morning May 25th. Every potential new attorney have asked me to postpone the deposition in order to allow us time to properly obtain council of record, obtain payment, and get up to date on the case. I am just leaving one potential new councils office right now but they will be unable to perform all conflict checks in time. I do not feel comfortable proceeding with tomorrow's deposition without proper council due to the alleged criminal accusations and needing time to properly consult with council. I have been dealing with multiple health issues and have been without my voice multiple times over the past 60 days in which I was forced to move forward prose without council further complicating these issues. Also, with the added complications due to the covid restrictions closing most offices as well as my own health, even trying to file this motion without help of any council has been extremely difficult for me prose. I ask that you instruct the court to postpone my deposition to allow for more time to obtain proper council and to allow time for the receiver/sec to return my laptop (and phone) for easier access to attend the necessary depositions.

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Michael Furman