

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

CASE NO. 20-cv-81250-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

COMPLETE BUSINESS SOLUTION GROUP,
INC. D/B/A PAR FUNDING, ET AL.,

Defendant(s).

**DEFENDANTS' UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME
TO ANSWER PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Joseph W. LaForte (“LaForte”), Lisa McElhone (“McElhone”), Joseph Cole Barleta (“Cole”), and Perry Abbonizio (“Abbonizio,” and together, the “Moving Defendants”) file this Unopposed Joint Motion of Extension of Time to Answer Plaintiff’s Amended Complaint, in which they request an extension of time to file their respective Answers and Affirmative Defenses to Plaintiff Securities and Exchange Commission’s (“Plaintiff[’s]”) Amended Complaint, and in support thereof state as follows:

On May 11, 2021, this Court denied Defendants’ Motion to Dismiss for Failure to State a Claim. D.E. 583. Since that time, the Moving Defendants have been diligently reviewing the nearly 300 paragraph Amended Complaint to prepare their respective Answers and Affirmative Defenses. The Moving Defendants seek short extensions of time to file their respective Answers and Affirmative Defenses, as follows:

- (i) LaForte, McElhone, and Cole request until June 2, 2021; and
- (ii) Abbonizio requests until June 8, 2021.

The Moving Defendants have conferred with counsel for the SEC, and the SEC has no objection to the requested extensions.¹ Accordingly, the Moving Defendants respectfully request that this Court grant the Unopposed Motion and authorize the Moving Defendants to file their respective Answers and Affirmative Defenses on or before the dates set forth above.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with the SEC and represents that the SEC does not oppose the relief requested in this Motion.

Date: May 25, 2021

Respectfully submitted,

/s/ Jeffrey E. Marcus

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¹ Defendant McElhone has agreed to advise Counsel for the SEC of the affirmative defenses she plans to file no later than the day before testifies at her deposition.

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2021, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: /s/ Jeffrey E. Marcus
Jeffrey E. Marcus

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.

**[PROPOSED] ORDER GRANTING UNOPPOSED JOINT MOTION FOR EXTENSION
OF TIME TO ANSWER PLAINTIFF'S AMENDED COMPLAINT**

THIS CAUSE having come before the Court on Defendants Joseph LaForte, Lisa McElhone, Joseph Cole Barleta, and Perry Abbonizio's Unopposed Joint Motion for Extension of Time to Answer Plaintiff's Amended Complaint (DE ____), the Court having reviewed the Unopposed Motion and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that the Motion is hereby GRANTED. Defendants LaForte, McElhone, and Cole Barleta shall have up to and including June 2, 2021 to file their Answer to the Amended Complaint. Defendant Abbonizio shall have up to and including June 8, 2021 to file his Answer to the Amended Complaint.

DONE AND ORDERED in Chambers, at Miami, Florida, this ____ day of May 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record via ECF