

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 20-cv-81250-RAR

FILED BY ACS D.C.  
MAY 27 2021  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.P.B.

SECURITIES AND EXCHANGE COMMISSION,  
*Plaintiff,*  
vs.  
COMPLETE BUSINESS SOLUTION GROUP, INC. D/B/A PAR FUNDING,  
*Defendant(s).*

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

Pursuant to Fed. R. Civ. P. 6(b), Defendant Michael C Furman, the "Moving Defendant" files this Unopposed 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. This Defendant has been forced to represent himself without the help of counsel, and my defense has been continually delayed as I have been unable to receive both my laptop & phone back from the receiver/sec after continual efforts these past months, both with and without counsel. The Moving Defendant seeks a short extension of time to file their respective Answers and Affirmative Defenses, which has been discussed and agreed to with opposing counsel at the SEC as follows:

- (i) Michael C Furman requests until June 8, 2021

The Moving Defendant have conferred with counsel for the SEC, and the SEC has no objection to the requested extensions. <sup>1</sup> Accordingly, the Moving Defendant respectfully request that this Court grant the Unopposed Motion and authorize the Moving Defendant 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.

Dated: May 26<sup>th</sup> 2021

Respectfully Submitted,

Michael C Furman  
Defendant, ProSe

