

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES)
AND EXCHANGE COMMISSION,)
))
Plaintiff,)
))
v.)
))
VEROS PARTNERS, INC,)
MATTHEW D. HAAB, JEFFERY B.)
RISINGER, VEROS FARM LOAN)
HOLDING LLC, TOBIN J. SENEFELD,)
FARMGROWCAP LLC and)
PINCAP LLC,)
))
Defendants,)
))
PIN FINANCIAL LLC,)
))
Relief Defendant.)

Case No. 1:15-cv-659-JMS-MJD

**DEFENDANTS VEROS FARM LOAN HOLDING, LLC, VEROS PARTNERS, INC.
AND MATTHEW D. HAAB’S PRELIMINARY WITNESS LIST**

Defendants, Veros Farm Loan Holding, LLC, Veros Partners, Inc., and Matthew D. Haab (collectively, “Defendants”), pursuant to the parties' Case Management Plan (Dkt. No. 67), submits the following preliminary list of potential witnesses:

1. Matthew D. Habb
2. Jeffery B. Risinger
3. Tobin J. Senefeld
4. Shawn Gustafson
5. Borrowers and Investors

Defendants reserve the right to amend or supplement this list based on information obtained during discovery. In addition, defendants reserve the right to call additional witnesses, as permitted by the Court, for use on rebuttal and/or as impeachment.

Dated: September 4, 2015

Respectfully submitted,

/s/ John F. McCauley

Richard J. Kiefer (5176-49)

John F. McCauley (20715-12)

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2015, I filed the foregoing Defendants' Preliminary Witness List via CM/ECF, which will notify all counsel of record.

/s/ John F. McCauley