

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

VEROS PARTNERS, INC,
MATTHEW D. HAAB,
JEFFERY B. RISINGER,
VEROS FARM LOAN HOLDING LLC,
TOBIN J. SENEFELD,
FARMGROWCAP LLC,
PINCAP LLC, and

Defendants,

PIN FINANCIAL LLC,

Relief Defendant.

**RECEIVER’S MOTION FOR ENLARGEMENT OF TIME
TO FILE QUARTERLY FEE APPLICATION**

William E. Wendling, Jr., the Receiver herein, by counsel, respectfully requests that the Court grant him a ten (10) day enlargement of time to and including May 26, 2016, in which to file his Quarterly Status Report. In support thereof the Receiver states:

1. Pursuant to paragraphs 60 through 65 on pages 21 and 22 of the Agreed Order Appointing Receiver (“Agreed Order”) [[Filing No. 34 at ECF pp. 21-22](#)], the Receiver and is required to apply to the Court for compensation and expense reimbursement from the Receivership Estates (the “Quarterly Fee Application”) and, prior to filing said Application, to

serve a complete copy of the proposed Application, together with all exhibits and relevant billing information, upon counsel for the SEC. The end of the first calendar quarter of 2016 was March 31st. Consequently, the Receiver's present Quarterly Fee Application is due on or before May 16, 2016, and said time has not yet passed.

2. The Receiver reasonably requires an enlargement of ten (10) days to and including May 26, 2016, to file his Quarterly Fee Application for the following reasons:

- a. On April 1, 2016, the Receiver joined Cohen Garelick and Glazier law firm, and the necessary move involved significant time to pack, move and then organize his clients and files, including those files related to this Receivership; to notify his clients, the investors, the courts and related counsel of the move; to open files with the new firm and set up the Receivership web pages;
- b. There were email and other issues for the first week the Receiver was at his new firm;
- c. The Receiver has spent significant time addressing issues related to the Williams/FarmGrowCap litigation and proposed settlement, the Boyer bankruptcy in Oregon, and matters related to various private placements including Cherry Farms, Veros Craft Brew/Flat 12 I, II and III, StadiumRed;
- d. The tax filings that were due by all of the various Receivership estates, getting K-1s to the investors, and addressing issues related thereto;
- e. The Receiver requested and obtained an enlargement of time to file his Quarterly Status Report to and including May 12, 2016, which the Receiver expects to file on May 12 and can therefore now concentrate on completion of the Quarterly Fee Application.

3. On May 11, 2016, the Receiver contacted Counsel for the United States Securities and Exchange Commission and the Defendants regarding this motion for enlargement and they have informed the Receiver they do not object.

Respectfully submitted,

By s/Anne Hensley Poindexter

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Counsel for the Receiver

Certificate of Service

I hereby certify that on May 12, 2016, a copy of the foregoing ***Receiver's Motion for Enlargement of Time to File Quarterly Fee Application*** was filed electronically. Notice of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Anne Hensley Poindexter

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