

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. RISING,)
VEROS FARM LOAN HOLDING LLC,)
TOBIN J. SENEFELD,)
FARMGROWCAP LLC,)
PINCAP LLC, AND)
))
Defendants,)
))
PIN FINANCIAL LLC,)
))
Relief Defendant.)

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

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO THE
COMMISSION’S MOTION FOR PRELIMINARY INJUNCTION**

Defendants, Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Folding LLC, by counsel, hereby move the Court to extend the deadline to respond to the Commission’s Motion for Preliminary Injunction, and state as follows:

1. On April 23, 2015, this Court granted the Securities and Exchange Commission’s (“SEC”) request for a Temporary Restraining Order (“TRO”) against the named Defendants in this action.

2. The Court has ordered these Defendants to file their response to the SEC’s Motion for a Preliminary Injunction by 1:00 p.m. on April 30, 2015.

3. Counsel for Defendants has been actively engaged in discussions with the SEC to resolve, or significantly narrow, any issues regarding the request for Preliminary Injunction.

4. The undersigned believes significant progress is being made toward resolution.

5. The Defendants and the SEC are scheduled for further discussions this afternoon.

6. Defendants' written response to the request for Preliminary Injunction necessarily depends on the outcome of these discussions.

7. Defendants respectfully request that the Court extend the current deadline for filing Defendants' response to the SEC's Motion for Preliminary Injunction from 1:00 p.m. today, April 30, 2015, until 7:00 p.m. today, so that Defendants and the SEC may continue to work towards reaching a mutual agreement with respect to the Preliminary Injunction and proposed order.

8. The SEC has no objection to this request.

Respectfully submitted,

/s/ John F. McCauley
John F. McCauley (20715-12)

BINGHAM GREENEBAUM DOLL LLP
10 West Market Street, Suite 2700
Indianapolis, IN 46204
(317) 635-8900
jmccauley@bgdlegal.com

*Attorney for Defendants,
Veros Partners, Inc., Matthew D. Haab and
Veros Farm Loan Folding LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2015 a copy of the foregoing “Unopposed Motion for Extension of Time to Respond to the Commission’s Motion for Preliminary Injunction” was filed electronically. Notice of this filing will be sent to the following counsel by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

Robert M. Moyer, MoyerR@sec.gov
Nicholas J. Eichenseer, EichenseerN@sec.gov
Doressia L. Hutton, HuttonD@sec.gov
Kathryn A. Pyzaska, PyzaskaK@sec.gov
J. Richard Kiefer, jrkiefer@bgdlegal.com
James J. Bell, jbell@bgdlegal.com
Ronald E. Elberger, RElberger@boselaw.com

/s/ John F. McCauley
John F. McCauley

BINGHAM GREENEBAUM DOLL LLP
10 West Market Street, Suite 2700
Indianapolis, IN 46204
(317) 635-8900
jmccauley@bgdlegal.com

*Attorney for Defendants,
Veros Partners, Inc., Matthew D. Haab and
Veros Farm Loan Folding LLC*