

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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UNITED STATES SECURITIES))
AND EXCHANGE COMMISSION,))
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Plaintiff,))
))
v.)	Case No. 1:15-cv-659-JMS-MJD
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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.))
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RECEIVER’S MOTION FOR ENLARGEMENT OF TIME
TO FILE QUARTERLY STATUS REPORT

William E. Wendling, Jr., the Receiver herein, by counsel, respectfully requests that the Court grant him an enlargement of time to and including May 10, 2017, in which to file his Quarterly Status Report. In support thereof the Receiver states:

1. Pursuant to paragraphs 55 and 56 on pages 19 and 20 of the Agreed Order Appointing Receiver (“Agreed Order”) [[Filing No. 34 at ECF pp. 19-20](#)], the Receiver is required to file and serve a full report and accounting (the “Quarterly Status Report”) within thirty (30) days after the end of each calendar quarter. The end of the last calendar quarter of 2017 was March 31st. Consequently, the Receiver’s present Quarterly Status Report is due on or before May 1, 2017.

2. The Receiver reasonably requires an enlargement of time to and including May 10, 2017, to file his Quarterly Status Report for the following reasons:
 - a. Receiver's counsel is currently out of the country and not due to return to the office until May 9, 2017;
 - b. The Receiver has spent significant time addressing issues related to the transfer of Blue Crop Group and the five Cherry Farms LLC private placements/loans to Investment Members and is hopeful that transfers of these private placements will be completed prior to submission of the Quarterly Status Report; and
 - c. The Receiver is awaiting comments from the United States Securities and Exchange Commission as to his Quarterly Status Report.

3. On May 1, 2017, the Receiver contacted Counsel for the United States Securities and Exchange Commission and counsel for the Defendant, Tobin Senefeld, regarding this motion for enlargement. Counsel for the United States Securities and Exchange Commission has no objection to an enlargement of time. As of the time of filing, no response has been received from counsel for Defendant, Tobin Senefeld.

Respectfully submitted,

By /s/ Anne Hensley Poindexter

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Counsel for the Receiver

Certificate of Service

I hereby certify that on May 1, 2017, a copy of the foregoing ***Receiver's Motion for Enlargement of Time to File Quarterly Status Report*** 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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