

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

UNITED STATES SECURITIES)
AND EXCHANGE COMMISSION,)
)
Plaintiff,)
)
v.)
)
VEROS PARTNERS, INC., et al,)
)
Defendants.)

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

MOTION FOR LEAVE TO WITHDRAW APPEARANCES

McNeely Stephenson, by and through the undersigned counsel, hereby respectfully moves the Court for leave to withdraw the appearances of J. Lee McNeely, Cynthia A. Bedrick, and Caroline E. Richardson as counsel for Interested Parties: Broyles Co., Nicole Broyles, Cherry Ag Services, LLC, Chris A. Cherry, Cristi K. Cherry, Cherry Farms, LLC, High Voltage Painting, LLC, Cherry Family Land, LLC, James E. Cherry, Susan L. Cherry, and Jeffrey A. Cherry (“Interested Parties”). In support thereof, McNeely Stephenson states as follows:

1. J. Lee McNeely and Cynthia A. Bedrick entered their Appearances in this matter on behalf of the Interested Parties on August 19, 2016.
2. Caroline E. Richardson entered her Appearance in this matter on November 29, 2016.
3. On January 25, 2017, the Receiver filed the following motions (the “Transfer Motions”):
 - a. Receiver’s Motion for Authority to Transfer Private Placement, Veros Cherry Farms LLC 2011 Loan (\$800,000) to Investment Members [Dkt. 334];

- b. Receiver's Motion for Authority to Transfer Private Placement, Veros Cherry Farms LLC 2012, \$1,200,000 Restructuring Loan to Investment Members [Dkt. 335];
 - c. Receiver's Motion for Authority to Transfer Private Placement, Veros Cherry Farms LLC 2013, \$1,500,000 Line of Credit Loan to Investment Members [Dkt. 336];
 - d. Receiver's Motion for Authority to Transfer Private Placement, Veros Cherry Farms LLC 2014, \$1,750,000 Line of Credit Loan to Investment Members [Dkt. 337]; and
 - e. Receiver's Motion for Authority to Transfer the Entity, Veros Cherry Farms LLC Individual Loans by 2014 and 2015 Investors to Investment Members [Dkt. 338].
4. On January 27, 2017, the Court approved the Transfer Motions [Dkt. 341, 342, 343, 344, 345].
5. Subsequently, the Receiver and the Investment Members, as that term is defined in the Transfer Motions, executed documents to effect transfer as requested and approved.
6. The Interested Parties were only involved in this litigation to the extent that the Receiver was empowered to investigate or collect on the loans at issue in the Transfer Motions.
7. Accordingly, the Receiver is no longer responsible for any matters involving the Interested Parties and, thus, the Interested Parties' involvement in this action is moot.

WHEREFORE, McNeely Stephenson respectfully requests that the Court grant its Motion For Leave to Withdraw the Appearance of J. Lee McNeely, Cynthia A. Bedrick and Caroline E. Richardson on behalf of Interested Parties, Broyles Co., Nicole Broyles, Cherry As Services, LLC,

Chris A. Cherry, Cristi K. Cherry, Cherry Farms, LLC, High Voltage Painting, LLC, Cherry Farm Lane, LLC, James E. Cherry, Susan L. Cherry and Jeffery A. Cherry and for all other appropriate relief.

Respectfully submitted,

McNEELY STEPHENSON

/s/ Caroline E. Richardson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 11, 2017 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Caroline E. Richardson _____

Caroline E. Richardson

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