

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. SENEFFELD, )  
FARM GROWCAP LLC, and )  
PINCAP LLC, )  
 )

Cause No. 1-15-cv-00659-JMS-MJD

**MOTION TO CONTINUE THE DEADLINE TO RESPOND TO  
THE COMMISSION’S MOTION FOR PRELIMINARY INJUNCTION**

Defendants Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC, by counsel J. Richard Kiefer and James J. Bell, hereby move the Court to continue the deadline to respond to the Commission’s Motion for Preliminary Injunction and in doing so, state the following:

1. This matter is currently set for an in person status conference on Friday May 1, 2015 at 10:45 a.m. and a preliminary injunction hearing on May 1, 2015 at 1:00 pm. Pursuant to the April 23, 2015 Temporary Restraining Order, the deadline to respond to the “Commission’s motion for preliminary injunction” is “no later than ninety-six hours before any scheduled hearing on the motion for preliminary injunction.” Therefore, the deadline for the response was today, April 27, 2015, at 1:00 pm.

2. The undersigned counsel was retained over the weekend and has not had sufficient time to file its Response to the Motion for Preliminary Injunction. (“Response.”)

3. Defendants Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC request that they be given until Thursday April 30, 2015 at 1:00 p.m. to file their Response.

4. The undersigned counsel spoke with Robert Moye and Nicholas Eichenseer, counsel for United States Securities Exchange Commission (“the Commission”), today and the Commission counsel authorized the undersigned counsel to advise the Court that the Commission has no objection to this Motion.

5. The undersigned counsel has also had discussions with the attorneys who are anticipated to represent the other defendants in this matter. These parties also have no objection to this Motion.

6. The undersigned counsel has had initial discussions with the Commission about a resolution that would avoid the need for the May 1, 2015 hearing. However, at this time, the parties have not had sufficient time to resolve these issues.

WHEREFORE, Defendants Veros Partners, Inc., Matthew D. Haab and Veros Farm Loan Holding LLC, by counsel, move the Court to continue the deadline to file a Response to the Commission’s Motion for Preliminary Injunction to Thursday April 30, 2015 at 1:00 p.m.

Respectfully submitted,

/s/ J. Richard Kiefer

J. Richard Kiefer, Atty. No. 5176-49

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***Counsel to Veros Partners, Inc., Matthew D. Haab  
And Veros Farm Loan Holding LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2015, a copy of the foregoing “Motion to Continue In Person Status Conference Preliminary Injunction Hearing and the Deadline to Respond to the Motion for Preliminary Injunction” was served on the following counsel of record:

Robert M. Moye, [MoyeR@sec.gov](mailto:MoyeR@sec.gov)  
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*/s/ J. Richard Kiefer* \_\_\_\_\_

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**ORDER GRANTING DEFENDANTS VEROS PARTNERS, INC.’S,  
MATTHEW D. HAAB’S AND VEROS FARM LOAN HOLDING LLC’S  
MOTION TO CONTINUE THE DEADLINE TO  
RESPOND TO THE COMMISSION’S MOTION FOR PRELIMINARY INJUNCTION**

Defendants Matthew Haab (“Haab”), Veros Partners, Inc., (“Veros”) and Veros Farm Loan Holding LLC (“Veros Farm”), by counsel, having filed their Motion to Continue the Deadline to Respond to the Commission’s Motion for Preliminary Injunction, and the Court being duly advised in the premises, finds that said motion should be, and hereby is, GRANTED.

IT IS THEREFORE ORDERED that the deadline for Defendants Haab, Veros and Veros Farm to respond to the Motion for Preliminary Injunction will be Thursday, April 30, 2015, at 1:00 p.m.

ALL OF WHICH IS ORDERED THIS \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Jane Magnus-Stinson  
United States District Court Judge  
Southern District of Indiana

Distribution:

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