

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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UNITED STATES SECURITIES )  
AND EXCHANGE COMMISSION, )  
  
Plaintiff, )  
  
v. )  
  
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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Case No. 1:15-cv-659-JMS-MJD

**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 a ten (10) day enlargement of time to and including May 12, 2016, 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 first calendar quarter of

2016 was March 31<sup>st</sup>. Consequently, the Receiver's present Quarterly Status Report is due on or before April 30, 2016, which is (tomorrow) a Saturday making the report then due on Monday, May 2, 2016, and said time has not yet passed.

2. The Receiver reasonably requires an enlargement of ten (10) days to and including May 12, 2016, to file his Quarterly Status Report 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; and,
- 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.

3. On April 29, 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 April 29, 2016, 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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*Counsel for the Receiver*

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MATTHEW D. HAAB,	)	
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VEROS FARM LOAN HOLDING LLC,	)	
TOBIN J. SENEFELD,	)	
FARMGROWCAP LLC,	)	
PINCAP LLC, and	)	
	)	
<b>Defendants,</b>	)	
	)	
PIN FINANCIAL LLC,	)	
	)	
<b>Relief Defendant.</b>	)	

**ORDER APPROVING RECEIVER’S MOTION FOR  
ENLARGEMENT OF TIME TO FILE QUARTERLY STATUS REPORT**

**WHEREAS** this matter has come before this Court upon the Receiver’s Motion for Enlargement of Time to File Quarterly Status Report to and including May 12, 2016;

**WHEREAS** the Court finds that the request is reasonable and should be granted.

**IT IS THEREFORE ORDERED** that the Receiver is granted an enlargement of time to and including May 12, 2016, in which to file and serve his Quarterly Status Report for the quarter ending March 31, 2016.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Jane Magnus-Stinson, Judge  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA

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