

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. SENEFELD,)
FARMGROWCAP LLC,)
PINCAP LLC, and)

Defendants,)

PIN FINANCIAL LLC,)

Relief Defendant.)

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 an enlargement of time to and including February 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

2016 was December 31st. Consequently, the Receiver's present Quarterly Status Report was due on or before January 30, 2017, which has already passed.

2. The Receiver reasonably requires an enlargement of time to and including February 10, 2017, to file his Quarterly Status Report for the following reasons:

- a. The Receiver, his counsel and his accountants and the SEC are preparing for the hearing on the Investors Amended Motion to Stay and Objection to Interim Distribution Methodology scheduled for February 8, 2017;
- b. The Receiver has spent significant time addressing issues related to the transfer of the Rockdale Holding, Stadiumred, and the five Cherry Farms LLC private placements/loans to Investment Members;
- c. Obtaining and providing information to Blue & Co. for year-end tax issues related to preparation of 1099s for FarmGrowCap, Blue Crop Group and Rockdale Holding;
- d. Obtaining and providing information to other entities related to the transfer and/or completion of several Private Placements in 2016 for year-end tax matters; and,
- e. There a number of ongoing matters that, although occurring after the December 31 cutoff, are significant to what the Receiver is reporting and that the Receiver believes are important and appropriate to include in this Report.

3. On February 2, 2017, the Receiver contacted Counsel for the United States Securities and Exchange Commission and the Defendants regarding this motion for enlargement. As of the filing of this motion, the SEC, counsel for Tobin Senefeld and counsel for MainSource

bank have informed the Receiver they do not object. The undersigned is unable to say whether any of the remaining counsel object to this motion for enlargement.

Respectfully submitted,

By /s/ Anne Hensley Poindexter

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Counsel for the Receiver

Certificate of Service

I hereby certify that on February 2, 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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**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 February 10, 2017;

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 February 10, 2017, in which to file and serve his Quarterly Status Report for the quarter ending December 31, 2016.

Dated: _____

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

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