

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

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.

**RECEIVER’S MOTION FOR ENLARGEMENT OF TIME TO FILE RECEIVER’S
ELEVENTH QUARTERLY STATUS REPORT AND RECEIVER’S ELEVENTH
QUARTERLY FEE APPLICATION AND REQUEST TO FILE FINAL REPORT AND
FINAL FEE APPLICATION IN LIEU THEREOF**

William E. Wendling, Jr., the Receiver herein, by counsel, files his Motion for Enlargement of Time to File Receiver’s Eleventh Quarterly Status Report and Receiver’s Eleventh Quarterly Fee Application and Request to File Final Report and Final Fee Application in Lieu Thereof, and in support of this Motion, the Receiver states as follows:

1. Pursuant to paragraphs 55 and 56 on pages 19 and 20 of the Agreed Order Appointing Receiver (“Agreed Order”) [[Filing No. 34, at 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 was December 31, 2017. Consequently, the Receiver's present Quarterly Status Report is due on January 30, 2018.

2. Further, pursuant to the Agreed Order, within forty-five (45) days after the end of each calendar quarter, the Receiver and Retained Personnel are to file with the Court an application for compensation and expense reimbursement [[Filing No. 34, at p. 21](#)]. Receiver's Motion for Eleventh Quarterly Fee Application is currently due on February 14, 2018.
3. The responsibilities of the Receiver are near completion and the Receiver anticipates filing a Final Report, Final Accounting, Notice of Completion of Efforts to Pursue Recoveries of Receivership Assets, and Motion to Terminate Receivership within thirty (30) days.
4. Consequently, the Receiver respectfully requests the Court enter an order allowing the Receiver to file Final Report, Final Accounting, Notice of Completion of Efforts to Pursue Recoveries of Receivership Assets, and Motion to Terminate Receivership in lieu of filing a separate Eleventh Quarterly Status Report and Motion for Eleventh Quarterly Fee Application ("Final Report and Accounting"). The Final Report and Accounting will include a full report and accounting of activities that took place in the last quarter of 2017, as well as time thereafter.
5. The Receiver contacted counsel for the United States Securities and Exchange Commission regarding this motion. The SEC indicated they have no objection thereto.

Respectfully submitted,

By /s/ Anne Hensley Poindexter

Anne Hensley Poindexter, #14051-29

Altman, Poindexter & Wyatt LLC

90 Executive Drive, Suite G

Carmel, Indiana 46032

Telephone: (317) 350-1000

Fax: (844) 840-3461

Email: apointexter@apwlawyer.com

Counsel for the Receiver

Certificate of Service

I hereby certify that on January 30, 2018, a copy of the foregoing ***Receiver's Motion for Enlargement of Time to File Receiver's Eleventh Quarterly Status Report and Receiver's Eleventh Quarterly Fee Application and Request to File Final Report and Final Fee Application in Lieu Thereof*** 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

Anne Hensley Poindexter, #14051-29

Altman, Poindexter & Wyatt LLC

90 Executive Drive, Suite G

Carmel, Indiana 46032

Telephone: (317) 350-1000

Fax: (844) 840-3461

Email: apointexter@apwlawyer.com