

2. Paragraph 2 states conclusions of law to which no response is required. Sahota lacks information sufficient to admit or deny the balance of the allegations in this paragraph, and therefore denies them.

3. Sahota lacks information sufficient to admit or deny the allegations Paragraph 3 and therefore denies them.

4. Sahota denies the allegations in Paragraph 4 that he repeatedly refused to provide information to Heartland. With regard to the remaining allegations in this paragraph, Sahota lacks information sufficient to admit or deny the allegations, and therefore denies them.

5. Sahota denies the allegations in Paragraph 5.

6. Sahota denies the allegations in Paragraph 6.

7. Paragraph 7 states the Plaintiff's legal positions and no response is required; to the extent that a response is required, Sahota denies the allegations in this paragraph.

8. Paragraph 8 contains legal conclusions to which no response is required; to the extent that a response is required, Sahota denies the allegations in this paragraph.

9. Paragraph 9 contains legal conclusions to which no response is required; to the extent that a response is required, Sahota denies the allegations in this paragraph.

10. Paragraph 10 contains legal conclusions to which no response is required; to the extent that a response is required, Sahota denies the allegations in this paragraph.

11. Sahota denies the allegations in Paragraph 11.

12. Sahota lacks sufficient information to admit or deny the allegations Paragraph 12 and therefore denies them.

13. Sahota lacks information sufficient to admit or deny the allegations Paragraph 13 and therefore denies them.

14. Sahota lacks information sufficient to admit or deny the allegations Paragraph 14 and therefore denies them.

15. Sahota lacks information sufficient to admit or deny the allegations Paragraph 15 and therefore denies them.

16. Sahota lacks information sufficient to admit or deny the allegations Paragraph 16 and therefore denies them.

17. Sahota lacks information sufficient to admit or deny the allegations Paragraph 17 and therefore denies them.

18. Sahota lacks information sufficient to admit or deny the allegations Paragraph 18 and therefore denies them.

19. Sahota lacks information sufficient to admit or deny the allegations Paragraph 19 and therefore denies them.

20. Paragraph 20 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

21. Paragraph 21 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

22. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 22, and therefore denies them.

23. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 23, and therefore denies them.

24. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 24, and therefore denies them.

25. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 25, and therefore denies them.

26. Sahota admits the allegations in the first two sentences of Paragraph 26. Sahota lacks information sufficient to admit or deny, and therefore denies, the remaining allegations in this paragraph.

27. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 27, and therefore denies them.

28. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 28, and therefore denies them.

29. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 29, and therefore denies them.

30. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 30, and therefore denies them.

31. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 31, and therefore denies them.

32. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 32, and therefore denies them.

33. Paragraph 33 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

34. Paragraph 34 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

35. Paragraph 35 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

36. Paragraph 36 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

37. Paragraph 37 references the contents of public documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny, and therefore denies, the allegations in this paragraph.

38. Sahota admits the allegations in the first sentence of Paragraph 38. As to the remaining allegations, Sahota lacks information sufficient to admit or deny, and therefore denies the remaining allegations.

39. Sahota admits the allegations in the first sentence of Paragraph 39. As to the remaining allegations, Sahota lacks information sufficient to admit or deny, and therefore denies the remaining allegations.

40. Sahota admits the allegations in the first sentence of Paragraph 40. As to the remaining allegations, Sahota lacks information sufficient to admit or deny, and therefore denies the remaining allegations.

41. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 41, and therefore denies them.

42. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 42, and therefore denies them.

43. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 43, and therefore denies them.

44. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 44, and therefore denies them.

45. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 45, and therefore denies them.

46. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 46, and therefore denies them.

47. Sahota lacks sufficient information to admit or deny the allegations in Paragraph 47, and therefore denies them.

48. Paragraph 48 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

49. Paragraph 49 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

50. Paragraph 50 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

51. Paragraph 51 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

52. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 52, and therefore denies them.

53. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 53, and therefore denies them.

54. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 54, and therefore denies them.

55. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 55, and therefore denies them.

56. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 56, and therefore denies them.

57. Paragraph 57 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them

58. Paragraph 58 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them

59. Paragraph 59 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them

60. Paragraph 60 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in the first three sentences of this paragraph, and therefore denies them. Sahota admits that Barron Petroleum was an operator of wells on the Conway lease, but lacks information sufficient to admit or deny the remaining allegations, and therefore denies them.

61. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 61, and therefore denies them.

62. Sahota admits the allegations in the first sentence of Paragraph 62 and admits that Dallas Resources received a \$500,000 payment from Heartland in February 2019. Sahota is

without information sufficient to admit or deny the allegation about Heartland's use of commingled funds, and therefore denies it; and Sahota denies the remaining allegations in this paragraph.

63. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 63, and therefore denies them.

64. Paragraph 64 references transactions governed by documents that speak for themselves. To the extent that a response is required, Sahota lacks information sufficient to admit or deny these allegations.

65. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 65, and therefore denies them.

66. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 66, and therefore denies them.

67. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 67, and therefore denies them.

68. Paragraph 68 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

69. Paragraph 69 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

70. Paragraph 70 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

71. Paragraph 71 references a document that speaks for itself. Sahota admits that Barron Petroleum was the operator of the Conway, Wolfcamp, and Carson lease projects. With regard to the balance of the allegations in this paragraph, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

72. Paragraph 72 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

73. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 73, and therefore denies them.

74. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 74, and therefore denies them.

75. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 75, and therefore denies them.

76. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 76, and therefore denies them.

77. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 77, and therefore denies them.

78. Sahota denies the allegations in the third sentence of Paragraph 78. Sahota lacks information sufficient to admit or deny the remaining allegations in this paragraph, and therefore denies them.

79. Sahota lacks sufficient information to admit or deny the allegations in the first sentence of Paragraph 79, and therefore denies them. Sahota denies the remaining allegations in this paragraph.

80. Sahota lacks sufficient information to admit or deny the allegations in the first sentence of Paragraph 80.

81. Paragraph 81 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

82. Paragraph 82 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

83. Paragraph 83 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

84. Paragraph 84 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

85. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 85, and therefore denies them.

86. Paragraph 86 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

87. Paragraph 87 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

88. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 88, and therefore denies them.

89. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 89, and therefore denies them.

90. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 90, and therefore denies them.

91. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 91, and therefore denies them.

92. Sahota admits that certain of the Sahota-related entities did business with Heartland during a certain period, but the facts alleged (the last sentence of Paragraph 92) contain no temporal constraint, and Sahota lacks information sufficient to admit or deny the remaining allegations in Paragraph 92, and therefore denies them.

93. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 93, and therefore denies them.

94. Paragraph 94 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

95. Paragraph 95 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

96. Paragraph 96 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

97. Paragraph 97 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

98. Paragraph 98 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

99. Paragraph 99 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

100. Paragraph 100 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

101. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 101, and therefore denies them.

102. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 102, and therefore denies them.

103. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 103, and therefore denies them.

104. Paragraph 104 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

105. Paragraph 105 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

106. Paragraph 106 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

107. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 107, and therefore denies them.

108. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 108, and therefore denies them.

109. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 109, and therefore denies them.

110. Paragraph 110 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

111. Paragraph 111 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

112. Paragraph 112 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

113. Sahota admits that a multi-million-dollar gas pipeline was needed to bring gas to be produced from the Carson wells to market, and denies the remaining allegations in Paragraph 113.

114. Sahota lacks information sufficient to admit or deny the allegations in the first sentence of Paragraph 114, and therefore denies them. Sahota denies the remaining allegations in this paragraph.

115. Sahota lacks information sufficient to admit or deny the allegation regarding the amount of revenue for the period identified, and therefore denies it, denies the remaining allegations in Paragraph 115.

116. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 116, and therefore denies them.

117. Sahota admits that Heartland asked Sahota to pay Heartland for production relating to two wells, and admits that Arcooil was the operator of those wells, and denies the remaining allegations in Paragraph 117.

118. Paragraph 118 references documents that speak for themselves, and to the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

119. Paragraph 119 references documents that speak for themselves, and to the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

120. Sahota denies the allegations in Paragraph 120.

121. Sahota denies the allegations in the first sentence of Paragraph 121. The second sentence of this paragraph contains no temporal limitations and Sahota therefore denies the allegations therein.

122. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 122, and therefore denies them.

123. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 123, and therefore denies them.

124. Paragraph 124 references a document that speaks for itself. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in this paragraph, and therefore denies them.

125. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 125, and therefore denies them.

126. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 126, and therefore denies them.

127. Paragraph 127 references public filings that speak for themselves, and legal conclusion to which no response is required. To the extent that a response is required, Sahota lacks information sufficient to admit or deny the allegations in Paragraph 127, and therefore denies them.

128. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 128, and therefore denies them.

129. Paragraph 129 references documents that speak for themselves, and to the extent that a response is required, Sahota lack information sufficient to admit or deny the allegations in this paragraph and therefore denies them.

130. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 130, and therefore denies them.

131. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 131, and therefore denies them.

132. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 132, and therefore denies them.

133. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 133, and therefore denies them.

134. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 134, and therefore denies them.

135. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 135, and therefore denies them.

136. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 136, and therefore denies them.

137. Sahota lacks information sufficient to admit or deny the allegations in Paragraph 137, and therefore denies them.

138. Sahota lacks information sufficient to admit or deny the allegations in the first sentence of Paragraph 138, and therefore denies them. Sahota further answers that Heartland stopped making payments that were due to the Sahota Defendants in September 2021, not October 2021.

139. Paragraph 139 references a document that speaks for itself. To the extent that a response is required, Sahota denies the allegations in this paragraph.

140. To the extent that a response is required to Paragraph 140, Sahota adopts and incorporates his responses to the allegations as set forth above.

141. Paragraph 141 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

142. Paragraph 142 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

143. Paragraph 144 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

144. Paragraph 144 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies

the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

145. To the extent that a response is required to Paragraph 145, Sahota adopts and incorporates his responses to the allegations as set forth above.

146. Paragraph 146 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

147. Paragraph 147 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

148. Paragraph 147 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

149. To the extent that a response is required to Paragraph 149, Sahota adopts and incorporates his responses to the allegations as set forth above.

150. Paragraph 150 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

151. Paragraph 151 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

152. Paragraph 152 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

153. To the extent that a response is required to Paragraph 153, Sahota adopts and incorporates his responses to the allegations as set forth above.

154. Paragraph 154 purports to describe a federal statute, and no response is required. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

155. Paragraph 155 purports to describe a federal statute, and no response is required. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

156. Paragraph 156 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

157. Paragraph 157 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

158. To the extent that a response is required to Paragraph 158, Sahota adopts and incorporates his responses to the allegations as set forth above.

159. Paragraph 159 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

160. Paragraph 160 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

161. Paragraph 161 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

162. To the extent that a response is required to Paragraph 162, Sahota adopts and incorporates his responses to the allegations as set forth above.

163. Paragraph 163 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

164. Paragraph 164 contains legal conclusions to which no response is required, and allegations that do not pertain to Sahota. To the extent that a response is required, Sahota denies the allegations in this paragraph relating to Sahota, and with regard to the remaining allegations, Sahota lacks information sufficient to admit or deny them, and therefore denies them.

165. To the extent that a response is required to Paragraph 165, Sahota adopts and incorporates his responses to the allegations as set forth above.

166. Paragraph 166 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

167. Paragraph 167 contains legal conclusions to which no response is required, and allegations that do not relate to Sahota. To the extent that a response is required, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

168. To the extent that a response is required to Paragraph 168, Sahota adopts and incorporates his responses to the allegations as set forth above.

169. With regard to the Sahota-related Relief Defendants, Sahota denies the allegations in Paragraph 169. With regard to the other Relief Defendants, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

170. With regard to the Sahota-related Relief Defendants, Sahota denies the allegations in Paragraph 170. With regard to the other Relief Defendants, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

171. With regard to the Sahota-related Relief Defendants, Sahota denies the allegations in Paragraph 171. With regard to the other Relief Defendants, Sahota lacks sufficient information to admit or deny these allegations, and therefore denies them.

172. Paragraph 172 contains legal conclusions to which no response is required.

With regard to Plaintiff's Relief Requested, Sahota denies that Plaintiff is entitled to the relief requested therein against Sahota, or any of the Sahota-related Defendants or Relief Defendants.

II. AFFIRMATIVE DEFENSES

A. Plaintiff's purported claims are barred because the Complaint fails to allege facts demonstrating false or misleading statements and to adequately describe the manner in which those statements were false or misleading.

B. Plaintiff's purported claims are barred based on the truth and sufficiency of all statements upon which their alleged claims are based.

C. Plaintiff's purported claims are barred because Sahota had no duty of disclosure with respect to the alleged misrepresentations or omissions.

D. Plaintiffs' purported claims are barred because the allegedly false and misleading statements were immaterial.

E. Plaintiffs' purported claims are barred because the allegedly false and misleading statements were immaterial and non-actionable opinion, projections, or puffery.

F. Plaintiff's purported claims are barred as and to the extent that they are allegations of "fraud by hindsight."

G. Plaintiff's purported claims are barred because Sahota acted in good faith.

H. Plaintiff's purported claims are barred because there is no causal link between Sahota's alleged misrepresentations and offer, purchase or sale of securities.

I. Plaintiff's purported claims are barred because the damages allegedly suffered are the proximate result of affirmative and/or independent actions of one or more third persons or parties over whom Sahota had no control and for whom Sahota is not liable.

J. Plaintiff's purported claims are barred to the extent that they are based on statements or actions that are not attributable to Sahota.

K. Plaintiff's purported claims are barred because Sahota did not employ any device, scheme, or artifice to defraud and did not engage in any act, practice, or course of conduct that operates or would operate as a fraud or deceit in connection with the purchase or sale of securities.

L. To the extent that Sahota failed to disclose material information, which Sahota denies, such information was credibly made available to Heartland and Heartland's investors

by other sources.

M. Plaintiff's purported claims are barred because Sahota did not know, and in the exercise of reasonable care could not have known, of any untruth or material omission that may be proved by Plaintiff.

N. Plaintiff's purported claims are barred because Heartland's investors knew, or in the exercise of reasonable care should have known, the risks inherent in investing in the securities at issue and thus assumed the risk of a decline in value of their investments.

O. To the extent that Sahota was in possession of any of the information the Plaintiff claims it failed to disclose, Sahota did not assimilate and comprehend the significance of that information.

Respectfully submitted,

VEDDER PRICE PC

By: /s/ Jeffrey J. Ansley

Jeffrey J. Ansley (SBN 00790235) 100

Crescent Court, Ste 350

Dallas, TX 75201

Telephone: (469) 895-4790 Facsimile:

(469) 895-4802

Email: jansley@vedderprice.com

EDMUNDSON SHELTON WEISS PLLC

By: /s/ J. Kevin Edmundson

J. Kevin Edmundson (SBN 24044020)

Jesse Z. Weiss (SBN 24013728)

317 Grace Lane, Suite 210

Austin, Texas 78746

Tel: 512-596-3058

Fax: 512-532-6637

Email: kevin@eswpllc.com

jesse@eswpllc.com

*Attorneys for Defendant Manjit Singh
"Roger" Sahota*

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing instrument has been served on all counsel of record pursuant to the Federal Rules of Civil Procedure this 15th day of February 2022.

/s/ Jeffrey J. Ansley