IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES SECURITIES	§	
AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. 4:21-cv-1310
	§	
THE HEARTLAND GROUP VENTURES,	§	Hon. Reed O'Connor
LLC, et al.,	§	
	§	
Defendants,	§	
	§	
	§	

AGREED MOTION TO EXTEND DEADLINE TO ANSWER OR RESPOND TO PLAINTIFF'S COMPLAINT THROUGH MARCH 15, 2022 FOR DEFENDANTS JOHN MURATORE AND THOMAS BRAD PEARSEY AND RELIEF DEFENDANT MURATORE FINANCIAL SERVICES, INC.

Plaintiff United States Securities and Exchange Commission ("Plaintiff"), and Defendants John Muratore and Thomas Brad Pearsey and Relief Defendant Muratore Financial Services, Inc. (collectively "Defendants") file this Agreed Motion To Extend Deadline To Answer Or Respond To Plaintiff's Complaint Through March 15, 2022, presently due to be filed on or before February 15, 2022.

On December 1, 2021, Plaintiff filed, under seal, its Complaint (Doc. 1) and its Emergency Motion for Temporary Restraining Order and Emergency Ancillary Relief (Doc. 2). The Defendants subsequently executed waivers of service of summons (Doc. 91, 92, and 93), and following such time, Defendants and Plaintiff have been engaged in good faith settlement negotiations. Extending the deadline will allow the parties to continue to work

towards an agreed to settlement. No party will be prejudiced as a result of the requested extension, and it is made in good faith and not for delay.

For the foregoing reasons, Plaintiff and the Defendants, as represented by the undersigned counsel, respectfully request that the Court extend to and through March 15, 2022, the deadline to answer or otherwise respond to Plaintiff's Complaint by Defendants John Muratore and Thomas Brad Pearsey and Relief Defendant Muratore Financial Services, Inc. A proposed order granting this relief is attached as Exhibit A and will be submitted in Word format as required.

Respectfully submitted,

/s/ Stephanie L. Reinhart
Stephanie L. Reinhart
SECURITIES AND EXCHANGE COMMISSION
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/s/ Theodore M. Grannatt

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Counsel for Defendants John Muratore and
Thomas Brad Pearsey and Relief
Defendant Muratore Financial Services,
Inc.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1, I hereby certify that the parties conferred in good faith to attempt to resolve or narrow the issues presented by this motion. The other parties to this matter do not oppose the relief requested herein.

/s/ Stephanie L. Reinhart
Stephanie L. Reinhart
SECURITIES AND EXCHANGE COMMISSION
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Exhibit A

Proposed Order

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES SECURITIES	§	
AND EXCHANGE COMMISSION,	§	
Plaintiff,	§ §	
	§	N. 4.21 - 1210
v.	8	No. 4:21-cv-1310
THE HEARTLAND GROUP VENTURES,	§	Hon. Reed O'Connor
LLC, et al.,	§	
	§	
Defendants,	§	
	§	
	§	

[PROPOSED] ORDER ON AGREED MOTION TO EXTEND DEADLINE TO ANSWER OR RESPOND TO PLAINTIFF'S COMPLAINT THROUGH MARCH 15, 2022 FOR DEFENDANTS JOHN MURATORE AND THOMAS BRAD PEARSEY AND RELIEF DEFENDANT MURATORE FINANCIAL SERVICES, INC.

On this date came to be considered an Agreed Motion To Extend Deadline To

Answer Or Respond To Plaintiff's Complaint Through March 15, 2022 for Defendants John

Muratore and Thomas Brad Pearsey and Relief Defendant Muratore Financial Services, Inc.

(the "Motion"). After considering the Motion, response(s), if any, and any and all other relevant matters of record, the Court is of the opinion that the Motion should be GRANTED.

IT IS THEREFORE ORDERED that Defendants John Muratore and Thomas Brad Pearsey and Relief Defendant Muratore Financial Services, Inc. may file an answer or otherwise respond to plaintiff SEC's complaint on or before March 15, 2022.

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SIGNED on this	day of February, 2022.
	THE HONORABLE U.S. DISTRICT JUDGE
	REED O'CONNOR

CERTIFICATE OF SERVICE

On **February 15, 2022**, I caused the foregoing filing to be transmitted to the following attorneys and *pro se* defendant by email at the email addresses reflected below.

/s/ Stephanie L. Reinhart
Stephanie L. Reinhart
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James Ikey (James.ikeyrcg@gmail.com) (defendant James Ikey)