



**RECEIVER’S RESPONSE TO MOTION TO TERMINATE OR MODIFY ASSET FREEZE  
AND RECEIVERSHIP ORDERS, MEMORANDUM IN SUPPORT, AND NOTICE OF  
CORRECTION TO DECLARATION OF SUNNY SAHOTA  
[Relates to ECF Nos. 129, 130, and 142]**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) over the Receivership Parties (as defined in this Court’s December 2, 2021 *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”),<sup>1</sup> files this Response (the “Response”) to *Motion to Terminate or Modify Asset Freeze and Receivership Orders* [ECF No. 129] (the “Motion”), *Memorandum in Support of Motion to Terminate or Modify Asset Freeze and Receivership Orders* [ECF No. 130] (the “Memorandum”), and the *Notice of Correction to Declaration of Sunny Sahota* [ECF No. 142] (the “Corrected Sahota Declaration”)<sup>2</sup> filed on behalf of Defendant Manjit Singh (aka Roger) Sahota (“Roger”) and Relief Defendants Harprit Sahota (“Harprit”), Sunny Sahota (“Sunny”), and Monroe Sahota (“Monrose”) (collectively, the “Sahotas”).

As demonstrated in the accompanying Brief in support of this Response, which is incorporated herein by reference, the Sahotas are not entitled to any of the relief requested.

The Receiver respectfully requests that the Court deny all of the relief requested by the Sahotas.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Receivership Order.

<sup>2</sup> The Corrected Sahota Declaration merely corrects that the Sahotas “received approximately \$12 million from sources other than Heartland between January 2018 and September 2021.” Corrected Sahota Declaration ¶ 16, at p. 10 n.8.

Dated: March 8, 2022

Respectfully submitted,

By /s/ Danielle N. Rushing

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**COUNSEL TO RECEIVER**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2022, the foregoing was served via this Court's CM/ECF.

/s/ Danielle N. Rushing  
Danielle N. Rushing