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

UNITED STATES SECURITIES AND	§	
EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
V.	§	CIVIL ACTION NO. 4-21CV-1310-O
	§	
THE HEARTLAND GROUP	§	
VENTURES, LLC, et al.,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
DODSON PRAIRIE OIL & GAS LLC, et	§	
al.	§	
	§	
Relief Defendants.	§	
	§	

SAHOTA DEFENDANTS LIST OF WITNESSES AND EXHIBITS FOR HEARINGS SET FOR MARCH 11, 2022

Defendant Manjit "Roger" Sahota and Relief Defendants Harprit Sahota, Sunny Sahota,

and Monrose Sahota (collectively the "Sahota Defendants") submit this Witness and Exhibit List

for Hearings set for March 11, 2022 at 1:30 pm.

WITNESSES

The Sahota Defendants may call the following witnesses at the hearing:

- 1. Sunny Sahota.
- 2. Albert McDaniel.

The Sahota Defendants reserve the right to call any witness designated by any other party

to this case or any other person attending the hearing, and rebuttal witnesses as warranted.

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EXHIBITS

The Sahota Defendants designate the following exhibits that may be offered at the hearing:¹

EXHIBIT	DESCRIPTION	OFFERED	OBJECT	ADMIT
1.	Corrected Declaration of Sunny Sahota (2/16/2022)			
2.	Sahota Worksheet of Oil & Gas Interests Held by Heartland (Appendix 0001-0002)			
3.	Sahota Worksheet of Heartland Payments for Pipe, Pipeline Construction and Equipment (Appendix 0003-0009)			
4.	Worksheet of Heartland's Payments for Drilling and Workover (Appendix 0005-0007)			
5.	Other Heartland Payments (Appendix 0008-0009)			
6.	Offer Letter from Trevino Resources (11/15/2022) (Appendix 0010-0013)			
7.	Estimated Possible and Probably Reserves for Childress/Soto (6/16/2021) (Appendix 0014-0021)			
8.	3D Seismic / Sahota Carson (Appendix 0022-0128)			
9.	Declaration of Richard G. Boyce (2/4/2022) (Appendix 0129-0151)			
10.	Declaration of Michael Fraim (2/7/2022) (Appendix 0152-0205)			
11.	Declaration of Albert McDaniel (2/4/2022) (Appendix 0206-0217)			
12.	Living Expenses (Appendix 0218-0226)			

¹ The exhibits were attached to the Sahota Defendants' Motion to Terminate or Modify Asset Freeze and Receivership Orders and produced to counsel for the SEC and the Receiver.

The Sahota Defendants reserve the right to use and/or offer any exhibits presented by any other party. The Sahota Defendants further reserve the right to supplement or amend this Witness List and Exhibit List any time prior to the hearing.

Respectfully submitted,

VEDDER PRICE PC

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COUNSEL FOR SAHOTA DEFENDANTS

CERTIFICATE OF SERVICE

I do hereby certify that on March 9, 2022, a true and correct copy of the above and foregoing instrument was filed electronically through the Court's CM/ECF system, which will give notice of this filing to all parties.

<u>/s/ Jeff J. Ansley</u> Jeffrey J. Ansley

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