

NOTICE OF PROPOSED TERMINATION OF RECEIVERSHIP PARTY

This Notice of Proposed Termination of Receivership Parties (the “Notice”) refers to the termination of Heartland Production and Recovery, LLC, a Receivership Party (the “Termination”). If you oppose the termination of the Receivership Party detailed herein, you must file and serve a written objection to the Termination (“Objection”) (and detail any claim of ownership or interest in the Receivership Party). Such Objection must state why the Receivership Party should not be terminated and the basis for such belief. The Receiver may request an expedited hearing on any Objection. If no party or interested person files and serves a timely Objection, the Receiver may terminate the entity without further Order of the Court, thereby authorizing Termination.

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17]) and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case”), hereby files this Notice of her intention to terminate Heartland Production and Recovery, LLC, a Receivership Party hereto pursuant to the Termination Procedures authorized by the *Order Approving Receiver’s Amended Motion to Approve Procedures for Termination Business Receivership Entities* [ECF No. 623] (the “Order”).

In the event that no objection or claim is filed within ten (10) business days of the date of this Notice, the Receiver has the authority, without further Order of the Court, to terminate the Receivership Party without further Order of the Court.

The Receiver reserves the right to postpone or withdraw the proposed Termination for any reason that she deems to be in the best interest of the Receivership Estates. To contact the Receiver’s counsel regarding an Objection or for additional information related to this Notice, please contact Dominique Douglas at (210) 554-5204 or heartlandreceivership@dykema.com.

Dated: January 8, 2025

Respectfully submitted,

By: /s/ Dominique A. Douglas

Danielle R. Behrends

State Bar No. 24086961

dbehrends@dykema.com

Dominique A. Douglas

State Bar No., 21434409

DYKEMA GOSSETT PLLC

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

and

Rose L. Romero

State Bar No. 17224700

Rose.Romero@RomeroKozub.com

LAW OFFICES OF ROMERO | KOZUB

235 N.E. Loop 820, Suite 310

Hurst, Texas 76053

Telephone: (682) 267-1351

COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case and via email on the following unrepresented parties on this Court's docket:

James Ikey
Bridy Ikey
james.ikeyrcg@gmail.com
bridydikey@gmail.com

IGroup Enterprises LLC
c/o James Ikey
james.ikeyrcg@gmail.com

John Muratore
jmuratore6@gmail.com

Muratore Financial Services, Inc.
c/o John Muratore
jmuratore6@gmail.com

Thomas Brad Pearsey
bradpearsey@aol.com

Manjit Singh (aka Roger) Sahota
Harprit Sahota
Monrose Sahota
rogersahota207@gmail.com

Sunny Sahota
sunnysanangelo@gmail.com

Alex Moore
c/o Rustin Brunson
amore@ccsb.com

/s/ Dominique A. Douglas
Dominique A. Douglas