

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

<b>UNITED STATES SECURITIES</b>	§	
<b>AND EXCHANGE COMMISSION,</b>	§	
	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Civil Action No. 4:21-cv-01310-O-BP</b>
	§	
<b>THE HEARTLAND GROUP</b>	§	
<b>VENTURES, LLC, <i>et al.</i>,</b>	§	
	§	
<b>Defendants.</b>	§	

**PLAINTIFF’S MOTION FOR A 45-DAY EXTENSION OF TIME TO FILE  
REMAINING MOTIONS FOR FINAL JUDGMENTS**

Plaintiff United States Securities and Exchange Commission (the “SEC”) respectfully submits this Motion for a 45-day Extension of Time to File Remaining Motions for Final Judgments. The SEC seeks this extension to allow it to finalize settlements with various Defendants and Relief Defendants, and to prepare motions for financial remedies against the remaining Defendants and Relief Defendants who will not settle. In further support of its motion, the SEC states as follows:

1. On December 5, 2024, the Court ordered the Plaintiff to file any motions for final judgment in this matter on or before February 18, 2025. (ECF No. 626). Since that time, the SEC has been diligently working towards reaching settlements with the remaining Defendants and Relief Defendants in this case.

2. The SEC recently received settlement offers from Defendants Brunson and Ikey and Relief Defendants Bridy Ikey and IGroup Enterprises LLC. The SEC also anticipates receiving settlement offers from those Defendants and Relief Defendants that are now controlled by the Court-appointed Receiver in this matter.

3. Despite its efforts to resolve the remainder of the case without Court intervention, the SEC does not anticipate receiving settlement offers from Defendant Manjit Singh (aka Roger) Sahota (“Sahota”) and Relief Defendants Sunny Sahota, Monroe Sahota, and Harprit Sahota. For those non-settling Defendants and Relief Defendants, the SEC plans to file motions in which the only issue before the Court is the amount of financial remedies to impose.

4. Because only the SEC’s Commissioners, and not SEC staff, can decide whether to settle a case or seek specific financial remedies, SEC staff members are required to circulate a written recommendation within the SEC for review and comment, and then submit the recommendation to the SEC’s Commissioners for their consideration and approval. This process normally takes several weeks, and the SEC staff requests a 45 day extension of time beyond February 18, 2025 to complete it. If the SEC’s Commissioners vote to accept these remaining settlement offers and authorize the filing of financial remedies motions against the non-settling Defendants/Relief Defendants, the SEC will promptly move for Court approval of the settlements and financial remedies against the non-settling parties.

5. The foregoing constitutes good cause for granting an extension pursuant to FED. R. CIV. P. 6(b)(1)(A).

6. This is the SEC’s first request for an extension of this deadline.

WHEREFORE, the SEC respectfully seeks a 45-day extension of time, to and including April 4, 2025, to file any remaining motions for final judgments.

Dated: January 24, 2025

Respectfully Submitted,

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION**

By: /s/ Jonathan S. Polish  
Jonathan S. Polish

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*Attorneys for Plaintiff U.S. Securities and Exchange  
Commission*

### **CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a), the undersigned counsel consulted with the Defendants and Relief Defendants. Counsel for Defendant Brunson and for the Receiver do not oppose the relief sought herein, nor does James Ikey or Bridy Ikey. Defendant Sahota does not consent to such relief, stating in an email “No, I will not” when asked if he consents to the requested relief. The SEC has received no response from Relief Defendant Sunny Sahota, and does not believe it has current email addresses for Relief Defendants Monroe Sahota and Harprit Sahota, and thus has been unable to seek their consent.

/s/ Jonathan S. Polish  
Jonathan S. Polish

### **CERTIFICATE OF SERVICE**

On January 24, 2025, I electronically filed the foregoing document with the clerk of court for this U.S. District Court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I have further emailed this filing to the following unrepresented parties on this Court’s docket:

James Ikey  
Bridy Ikey  
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