

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

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

V.

THE HEARTLAND GROUP VENTURES, LLC; HEARTLAND PRODUCTION AND RECOVERY LLC; HEARTLAND PRODUCTION AND RECOVERY FUND LLC; HEARTLAND PRODUCTION AND RECOVERY FUND II LLC; THE HEARTLAND GROUP FUND III, LLC; HEARTLAND DRILLING FUND I, LP; CARSON OIL FIELD DEVELOPMENT FUND II, LP; ALTERNATIVE OFFICE SOLUTIONS, LLC; ARCOOIL CORP.; BARRON PETROLEUM LLC; JAMES IKEY; JOHN MURATORE; THOMAS BRAD PEARSEY; MANJIT SINGH (AKA ROGER) SAHOTA; and RUSTIN BRUNSON,

Defendants,

and

DODSON PRAIRIE OIL & GAS LLC; PANTHER CITY ENERGY LLC; MURATORE FINANCIAL SERVICES, INC.; BRIDY IKEY; ENCYIPHER BASTION, LLC; IGROUP ENTERPRISES LLC; HARPRIT SAHOTA; MONROSE SAHOTA; SUNNY SAHOTA; BARRON ENERGY CORPORATION; DALLAS RESOURCES INC.; LEADING EDGE ENERGY, LLC; SAHOTA CAPITAL LLC; and 1178137 B.C. LTD.,

Relief Defendants.

No. 4-21CV-1310-O-BP

NOTICE OF PROPOSED TERMINATION OF RECEIVERSHIP PARTY

This Notice of Proposed Termination of Receivership Parties (the “Notice”) refers to the termination of Leading Edge 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 Leading Edge 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: December 10, 2024

Respectfully submitted,

By: /s/ Dominique A. Douglas

Danielle R. Behrends

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024, 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:

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/s/ Dominique A. Douglas
Dominique A. Douglas