

**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, §**

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

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. §

**THIRD SUPPLEMENTAL RESPONSE AT REQUEST OF COURT TO
RECEIVER'S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN
OCTOBER 1, 2024 AND DECEMBER 31, 2024, AND BRIEF IN SUPPORT
[ECF NO. 676]**

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] (the "Receivership Order"))¹ and receivership estates (collectively, the "Receivership Estates") in the above-captioned case (the "Case"), hereby files this *Third Supplemental Response at Request of Court to Receiver's Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support [ECF No. 676]* (the "Supplemental Response") in accordance with the Court's directive on March 11, 2025.

1. On February 4, 2025, the Receiver filed the *Receiver's Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support* [ECF No. 676] (the "Application"), which requested, in part, Court approval, on an interim basis, and authorization of payment of fees incurred by Jones in the amount of \$1,430.00 for services performed during the Application Period as oil and gas transactional counsel to the Receiver.

I. RESPONSE

2. At the direction of the Court, the Receiver has reviewed Jones' invoices during the Application Period.

3. The Receiver has verified that Jones has expended an aggregate of 8.30 hours on this Case during the Application Period. At Jones' discounted standard hourly rate of \$325.00 per hour for all counsel, Jones' fees for the Application Period total \$1,430.00.

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Receivership Order or the Application, as applicable.

4. At the direction of the Court on March 11, 2025, the Receiver attaches Jones' October, November, and December invoices to this Supplemental Response as **EXHIBIT A**.

II. CONCLUSION

5. The Receiver respectfully requests the Court enter an Order approving the Application, in part, as modified below with respect to Jones:

- (a) Fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling **\$1,430.00**.

Dated: March 11, 2025

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

Danielle R. Behrends
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and

Rose L. Romero
State Bar No. 17224700
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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 March 11, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case, including Securities and Exchange Commission, 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
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Manjit Singh (aka Roger) Sahota
Harprit Sahota
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rogersahota207@gmail.com

Sunny Sahota
sunnysanangelo@gmail.com

/s/ Danielle Rushing Behrends
Danielle Rushing Behrends

EXHIBIT A

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

November 03, 2024

Deborah Williamson
Dykema Gossett PLLC
112 E. Pecan St.
Ste 1800
San Antonio, TX 78205

Invoice Number: 1032

Invoice Period: 10-01-2024 - 10-31-2024

Payment Terms: Upon Receipt
Make check payable to the Law Practice of Darrell R. Jones, PLLC

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Time Details

Date	Professional	Task	Hours	Rate	Amount
10-14-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding escheat update and land update.	0.50	325.00	162.50
10-23-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding multiple TRRC orders.	0.80	325.00	260.00
Total					422.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	1.30	422.50
Total		422.50

Total for this Invoice 422.50

Client Statement of Account

As of 11-04-2024

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	3,120.00
Total Amount to Pay	3,120.00

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Transactions

Date	Transaction	Applied	Invoice	Amount
10-04-2024	Previous Balance			2,697.50
11-03-2024	Invoice 1032			422.50
			Balance	3,120.00

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
08-06-2024	Invoice 1003	1,917.50		1,917.50
09-02-2024	Invoice 1010	552.50		552.50
10-04-2024	Invoice 1022	227.50		227.50
11-03-2024	Invoice 1032	422.50		422.50
			Balance	3,120.00

Deborah Williamson
 Dykema Gossett PLLC
 112 E. Pecan St.
 Ste 1800
 San Antonio, TX 78205

November 03, 2024

Law Practice of Darrell R. Jones, PLLC
 34 E Wedgemere Cir
 Spring, TX 77381

Invoice Number: 1032
 Invoice Period: 10-01-2024 - 10-31-2024

REMITTANCE COPY

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Fees	422.50
Total for this Invoice	422.50
Previous Balance	2,697.50

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	3,120.00
Total Amount to Pay	3,120.00

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
08-06-2024	Invoice 1003	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,917.50		1,917.50
09-02-2024	Invoice 1010	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	552.50		552.50
10-04-2024	Invoice 1022	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	227.50		227.50
11-03-2024	Invoice 1032	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	422.50		422.50
				Balance	3,120.00

Make check payable to the Law Practice of Darrell R. Jones, PLLC.

drj@oilesquire.com
(832) 302-5373

December 02, 2024

Deborah Williamson
Dykema Gossett PLLC
112 E. Pecan St.
Ste 1800
San Antonio, TX 78205

Invoice Number: 1041
Invoice Period: 11-01-2024 - 11-30-2024

Payment Terms: Upon Receipt
Make check payable to the Law Practice of Darrell R. Jones, PLLC
RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Time Details

Date	Professional	Task	Hours	Rate	Amount
11-01-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding well operations	0.50	325.00	162.50
11-06-2024	Darrell Jones	B130 - Asset Disposition Review SDMB Farmout Agreement and JOA to form guidance to client on Carry and future cost exposure topics; meeting with client to discuss same.	2.30	325.00	747.50

Total 910.00

Time Summary

Professional	Hours	Amount
Darrell Jones	2.30	747.50
Eric Hillerman	0.50	162.50
Total		910.00

Total for this Invoice 910.00

Client Statement of Account

As of 12-03-2024

Matter		Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities		1,332.50
	Total Amount to Pay	1,332.50

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Transactions

Date	Transaction	Applied	Invoice	Amount
11-03-2024	Previous Balance			3,120.00
11-21-2024	Payment Received - Reference 1358			(2,697.50)
11-24-2024	Payment Applied	1,917.50	1003	
11-24-2024	Payment Applied	552.50	1010	
11-24-2024	Payment Applied	227.50	1022	
12-02-2024	Invoice 1041			910.00
			Balance	1,332.50

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
11-03-2024	Invoice 1032	422.50		422.50
12-02-2024	Invoice 1041	910.00		910.00
			Balance	1,332.50

Deborah Williamson
 Dykema Gossett PLLC
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 Ste 1800
 San Antonio, TX 78205

December 02, 2024

Law Practice of Darrell R. Jones, PLLC
 34 E Wedgemere Cir
 Spring, TX 77381

Invoice Number: 1041
 Invoice Period: 11-01-2024 - 11-30-2024

REMITTANCE COPY

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Fees	910.00
Total for this Invoice	910.00
Previous Balance	422.50

Matter

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

	Balance Due
	1,332.50
Total Amount to Pay	1,332.50

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
11-03-2024	Invoice 1032	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	422.50		422.50
12-02-2024	Invoice 1041	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	910.00		910.00
				Balance	1,332.50

Make check payable to the Law Practice of Darrell R. Jones, PLLC.

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

January 03, 2025

Deborah Williamson
Dykema Gossett PLLC
112 E. Pecan St.
Ste 1800
San Antonio, TX 78205

Invoice Number: 1051

Invoice Period: 12-01-2024 - 12-31-2024

Payment Terms: Upon Receipt
Make check payable to the Law Practice of Darrell R. Jones, PLLC

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Time Details

Date	Professional	Task	Hours	Rate	Amount
12-31-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding SDMB Letter to Receiver.	0.30	325.00	97.50
Total					97.50

Time Summary

Professional	Hours	Amount
Eric Hillerman	0.30	97.50
Total		97.50
Total for this Invoice		97.50

Client Statement of Account

As of 01-03-2025

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,430.00
Total Amount to Pay	1,430.00

Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Transactions

Date	Transaction	Applied	Invoice	Amount
12-02-2024	Previous Balance			1,332.50
01-03-2025	Invoice 1051			97.50
			Balance	1,430.00

Open Invoices and Credits

Date	Transaction	Amount	Applied	Balance
11-03-2024	Invoice 1032	422.50		422.50
12-02-2024	Invoice 1041	910.00		910.00
01-03-2025	Invoice 1051	97.50		97.50
			Balance	1,430.00

Deborah Williamson
 Dykema Gossett PLLC
 112 E. Pecan St.
 Ste 1800
 San Antonio, TX 78205

January 03, 2025

Law Practice of Darrell R. Jones, PLLC
 34 E Wedgemere Cir
 Spring, TX 77381

Invoice Number: 1051
 Invoice Period: 12-01-2024 - 12-31-2024

REMITTANCE COPY

RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities

Fees	97.50
Total for this Invoice	97.50
Previous Balance	1,332.50

Matter	Balance Due
Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	1,430.00
Total Amount to Pay	1,430.00

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
11-03-2024	Invoice 1032	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	422.50		422.50
12-02-2024	Invoice 1041	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	910.00		910.00
01-03-2025	Invoice 1051	Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities	97.50		97.50
				Balance	1,430.00

Make check payable to the Law Practice of Darrell R. Jones, PLLC.