

NOTICE OF PROPOSED SALE OF REAL PROPERTY

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) in the above-captioned case (the “Case”), hereby files and publishes this *Notice of Proposed Sale of Real Property* (the “Notice”) of her intention to sell the real property (the “Property”) identified on **Exhibit A** hereto pursuant to the procedures authorized by the Court’s July 15, 2022 *Order* [ECF No. 240] (the “Order”).¹

In accordance with the Order, the Receiver retained Western Appraisal, LLC and Bierschwale Land Company, LLC as non-residential appraisers. She also engaged a broker in connection with the listing and sale of the Property. On January 12, 2023, the Receiver accepted an offer for the Property at a proposed sale price of \$186,500.00, which is higher than any of the appraised values for the Property.

Pursuant to the Order, any third party may make a subsequent offer of at least ten (10%) percent more than the proposed sale price of \$186,500.00 (the “Cash Offer”) under similar terms and conditions of sale. The Cash Offer is not subject to financing or other third party approval. The Receiver has confirmed the ability of the Cash Offer to timely close. Any competing offer must be submitted in writing to counsel for the Receiver at drushing@dykema.com by no later than January 26, 2023, which is ten (10) business days from the filing of this Notice (a “Higher Offer”).

If one or more Higher Offers are received, the Receiver will provide a limited opportunity for additional offers to be submitted.

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Order.

To contact the Receiver's counsel for additional information related to this Notice, please contact Danielle N. Rushing at (210) 554-5528 or drushing@dykema.com.

Dated: January 12, 2023

Respectfully submitted,

By: /s/ Danielle N. Rushing

Danielle N. Rushing

State Bar No. 24086961

drushing@dykema.com

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 12, 2023, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff Securities and Exchange Commission and Defendant Rustin Brunson; served via email as detailed below; and posted on the Receivership website at www.heartlandreceivership.com/notices. Other parties submitting offers for the purchase of the Property, if any, will be emailed a copy of the foregoing document and will not be included herein for privacy reasons. The Property broker will also provide a copy of the foregoing document to other potentially interested parties.

James Ikey
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Bridy Ikey
bridydikey@gmail.com

Manjit Singh (aka Roger) Sahota
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Sunny Sahota
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/s/ Danielle N. Rushing
Danielle N. Rushing

Exhibit A

Legal Description:

Tract 1: Being all of Lot Nos Six, Seven, Eight, Nine, Ten, Eleven, Twelve, Thirteen, Fourteen, Fifteen, Sixteen and Seventeen (6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17), all in Block No Seventeen (17) of the Bishop Addition out of the T J Cockrell Survey, Abstract No 1403, Young County, Texas as recorded in the deed records of Young County Year 2017 Instrument number 17001428.

Tract 2: BEING 1.461 acres out of the T. J. Cockrell Survey, Abstract No. 1403, Young County, Texas. Said 1.461 acres also being part of the Bishop's Addition and part of an old highway right-of-way. Said addition recorded in Vol. 1 Pg. 27 of the plat records of said county. Said 1.461 acres being described in metes and bounds as follows:

BEGINNING at a ½ inch iron rod found at the northwest corner of Lot 6, Block 17 of said Bishop's Addition;
THENCE N 10°17' 16" W 55.14 feet to a fence corner found for corner in the southeast right-of-way line of State Highway 67;
THENCE N 50°17' 1 0" E 205.35 feet with said right-of-way line to a 3/8 inch iron rod set for corner;
THENCE S 80°58'43" E 344.96 feet partly along an existing fence to a ½ inch iron rod found for corner;
THENCE S 9°31 '44" W 220.5 feet partly with the east line of said Block 17 to a ½ inch iron rod found at the southeast corner of Lot 45;
THENCE N 80°28' 16 W 150.0 feet with the south line of said Lot 45 to a ½ inch iron rod found for angle point;
THENCE S 83°51 '34" W 106.02 feet to a ½ inch iron rod found for corner in the southeast line of Lot 11;
THENCE N 57°00'48" E 163.8 feet with the southeast line of Lots 11 thru 17 to a 3/8 inch iron set for the southeast corner of said Lot 17;
THENCE N 33°00'16" W 150.0 feet with the northeast line of said Lot 17 to a 3/8 inch iron rod set for corner;
THENCE S 56°59'44" W 245.0 feet with the northwest line of Lots 8 thru 17 to a 3/8 inch iron rod set for corner;
THENCE S 79°42'44" W 50.0 feet with the north line of Lot 7 and Lot 6 to the point of beginning containing 1.461 acres more or less.

LAWSON LAND SURVEYING, L.L.C.

191 DIANNA DR.
GRAHAM, TX 76450
940-521-2465

December 23, 2022

FIELDNOTES

TRACT 2

BEING 1.461 acres out of the T. J. Cockrell Survey, Abstract No. 1403, Young County, Texas. Said 1.461 acres also being part of the Bishop's Addition and part of an old highway right-of-way. Said addition recorded in Vol. 1 Pg. 27 of the plat records of said county. Said 1.461 acres being described in metes and bounds as follows:

BEGINNING at a ½ inch iron rod found at the northwest corner of Lot 6, Block 17 of said Bishop's Addition;

THENCE N 10°17'16" W 55.14 feet to a fence corner found for corner in the southeast right-of-way line of State Highway 67;

THENCE N 50°17'10" E 205.35 feet with said right-of-way line to a 3/8 inch iron rod set for corner;

THENCE S 80°58'43" E 344.96 feet partly along an existing fence to a ½ inch iron rod found for corner;

THENCE S 9°31'44" W 220.5 feet partly with the east line of said Block 17 to a ½ inch iron rod found at the southeast corner of Lot 45;

THENCE N 80°28'16" W 150.0 feet with the south line of said Lot 45 to a ½ inch iron rod found for angle point;

THENCE S 83°51'34" W 106.02 feet to a ½ inch iron rod found for corner in the southeast line of Lot 11;

THENCE N 57°00'48" E 163.8 feet with the southeast line of Lots 11 thru 17 to a 3/8 inch iron set for the southeast corner of said Lot 17;

THENCE N 33°00'16" W 150.0 feet with the northeast line of said Lot 17 to a 3/8 inch iron rod set for corner;

THENCE S 56°59'44" W 245.0 feet with the northwest line of Lots 8 thru 17 to a 3/8 inch iron rod set for corner;

THENCE S 79°42'44" W 50.0 feet with the north line of Lot 7 and Lot 6 to the point of beginning containing 1.461 acres more or less.


J.G. LAWSON, JR.

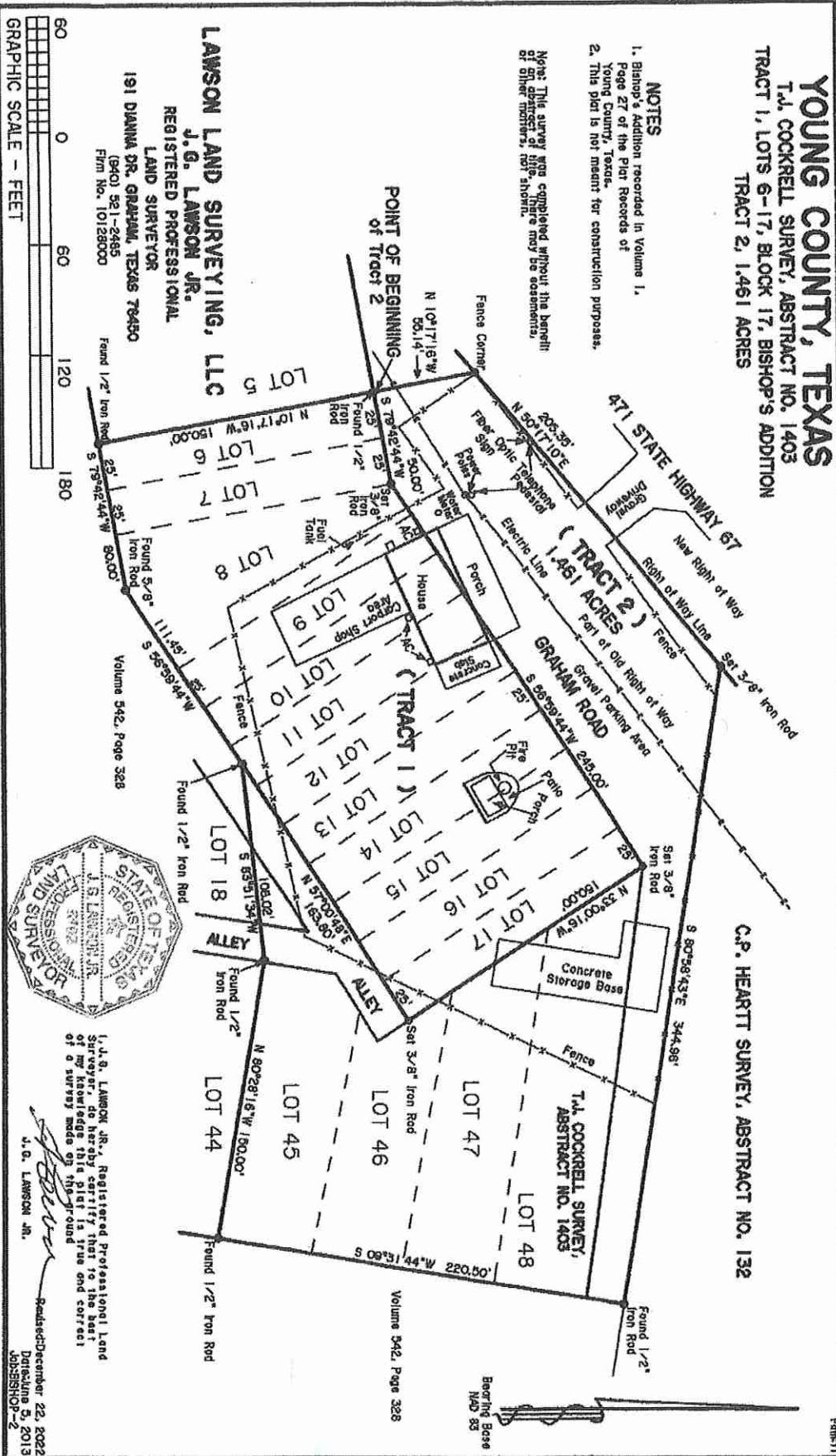


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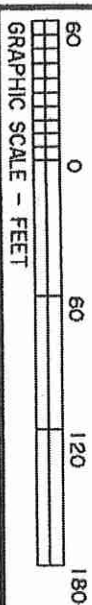
YOUNG COUNTY, TEXAS
T.J. COCKRELL SURVEY, ABSTRACT NO. 1403
TRACT 1, LOTS 6-17, BLOCK 17, BISHOP'S ADDITION
TRACT 2, 1.461 ACRES

NOTES
 1. Bishop's Addition recorded in Volume 1, Page 27 of the Plat Records of Young County, Texas.
 2. This plat is not meant for construction purposes.

Note: This survey was completed without the benefit of an abstract of title. There may be easements, or other matters, not shown.



LAWSON LAND SURVEYING, LLC
J.G. LAWSON JR.
 REGISTERED PROFESSIONAL
 LAND SURVEYOR
 191 DIANNA DR. GRAHAM, TEXAS 78430
 (940) 581-2465
 FIRM No. 10128000



I, J.G. LAWSON JR., Registered Professional Land Surveyor, do hereby certify that to the best of my knowledge this plat is true and correct of a survey made on this ground.

J.G. LAWSON JR.

Recorded December 22, 2022
 Date: June 5, 2013
 JOB: BISHOP-2

Panor 1