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

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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, et al.

Relief Defendants.

4-21CV-1310-0

#### FILED UNDER SEAL

## PLAINTIFF UNITED STATES SECURITIES AND EXCHANGE COMMISSION'S MOTION TO FILE PAPERS UNDER SEAL

Plaintiff United States Securities and Exchange Commission hereby moves for an order to file all papers submitted contemporaneously herewith under seal and to temporarily

seal the entire case file. The SEC makes this motion because general knowledge of this proceeding prior to the execution of the requested relief could substantially frustrate the purposes of such relief – particularly the possible dissipation of ill-gotten gains, as reflected in the Rule 65(b) Certification in Support of Motion for Temporary Restraining Order and Ancillary Relief, which has been filed contemporaneously herewith.

The attached proposed order should afford the SEC sufficient time to allow service of papers upon defendants and the financial institutions and/or third parties with custody of their assets.

WHEREFORE, plaintiff United States Securities and Exchange Commission respectfully requests that the Court grant its motion, enter the proposed order granting it leave to make filings in this matter under seal and temporarily sealing the entire case file in this matter, and grant such other and further relief as the Court deems just and proper.

Dated: December 1, 2021

Respectfully submitted,

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION

By: <u>/s/ Jonathan S. Polish</u> Jonathan S. Polish

Jonathan S. Polish (IL Bar No. 6237890) pro hac vice pending Stephanie L. Reinhart (IL Bar No. 6287179) pro hac vice pending

# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

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### UNITED STATES SECURITIES AND EXCHANGE COMMISSION

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