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

UNITED STATES SECURITIES AND	§
EXCHANGE COMMISSION,	§
	§
Plaintiff,	8
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	§ CIVIL ACTION No. 4-21CV-1310-O
V.	8
	8
THE HEARTLAND GROUP	8
VENTURES, LLC, et al.,	8
	8
Defendants,	§
J ,	§
and	§
	§
DODSON PRAIRIE OIL & GAS LLC, et	§
	§
al.	8
	8
Relief Defendants.	S

UNOPPOSED MOTION TO WITHDRAW APPEARANCE AS COUNSEL FOR DEFENDANT ROGER SAHOTA AND RELIEF DEFENDANTS HARPRIT SAHOTA, SUNNY SAHOTA AND MONROSE SAHOTA

The undersigned counsel for Defendant Roger Sahota and Relief Defendants Harprit Sahota, Sunny Sahota, and Monrose Sahota (collectively the "Sahota Defendants") respectfully move this Court to withdraw as counsel of record in this civil action.

1. Since the commencement of this action, Roger Sahota has been subject to an Asset Freeze Order (Dkt. 14), which froze Mr. Sahota's access to all of his cash savings. Additionally, the Court placed all of Mr. Sahota's related corporate entities into receivership (Dkt. 17).

¹ Those entities include: Defendants ArcoOil Corp. and Barron Petroleum LLC, and Relief Defendants Barron Energy Corporation, Dallas Resources Inc., Leading Edge Energy LLC, Sahota Capital LLC, and 1178137 B.C. Ltd.

2. To date, counsel for the Sahota Defendants have negotiated the terms of a (a)

preliminary injunction (Dkt. 38), (b) filed an answer on behalf of each of the Sahota Defendants,

and (c) negotiated a judgment with respect to liability in this matter (Dkt. 133-136). Counsel also

filed a motion to modify the asset freeze order so that, among other things, the Sahota Defendants

could have access to funds for living expenses and legal fees. (Dkt. 129). The Court, however,

denied the Sahota Defendants' motion. (Dkt. 195).

3. The Sahota Defendants do not have access to funds to satisfy their ongoing legal

defense costs and counsel for the Sahota Defendants now seek the Court's permission to withdraw

from the case.

4. The Sahota Defendants consent to the withdrawal of counsel as reflected below.

5. Counsel for the Sahota Defendants do not represent any of the corporate entities

that are identified as defendants or relief defendants in this action.

6. This motion and request for withdrawal is not sought to delay these proceedings,

and neither the Plaintiff Securities and Exchange Commission nor the Receiver opposes the relief

sought herein.

Accordingly, counsel for the Sahota Defendants, Jeffrey Ansley of Vedder Price PC and

Kevin Edmundson and Jesse Weiss of Edmundson Shelton Weiss PLLC, respectfully request that

the Court grant this motion to withdraw.

Respectfully submitted,

VEDDER PRICE PC

By: /s/ Jeffrey J. Ansley

Jeffrey J. Ansley (SBN 00790235)

100 Crescent Court, Ste 350

Dallas, TX 75201

Janas, 1A 13201

Telephone: (469) 895-4790

Facsimile: (469) 895-4802

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Email: jansley@vedderprice.com

EDMUNDSON SHELTON WEISS PLLC

J. Kevin Edmundson (SBN 24044020)

Jesse Z. Weiss (SBN 24013728)

317 Grace Ln, Ste 210

Austin, TX 78746

Telephone: (512) 596-3058 Facsimile: (512) 532-6637 Email: kevin@eswpllc.com jesse@eswpllc.com

COUNSEL FOR SAHOTA DEFENDANTS

CLIENT CONSENT

The Sahota Defendants consent to the withdrawal of counsel as stated herein.

Manjit Singh (Roger) Sahota

12642 Raspberry Lane

San Angelo, Texas 76904

(214) 778-8968

Harprit Sahota

12642 Raspberry Lane

San Angelo, Texas 76904

(214) 778-8968

Sunny Sahota

12642 Raspberry Lane

San Angelo, Texas 76904

(214) 778-8968

Monrose Sahota

12642 Raspberry Lane

San Angelo, Texas 76904

(214) 778-8968

CERTIFICATE OF CONFERENCE

Counsel for the Sahota Defendants have conferred with counsel for the SEC and the Receiver. They do not oppose the relief sought in this motion.

CERTIFICATE OF SERVICE

I do hereby certify that on May 27, 2022, a true and correct copy of the above and foregoing instrument was filed electronically through the Court's CM/ECF system, which will give notice of this filing to all parties.

<u>/s/ Jeffrey J. Ansley</u> Jeffrey J. Ansley