

**MOTION FOR EXPEDITED CONSIDERATION OF
RECEIVER’S MOTION TO DETERMINE EXTENT AND VALIDITY
OF INTERESTS OF ALBERT ARBELAEZ [ECF NO. 248]**

TO THE HONORABLE U.S. MAGISTRATE JUDGE HAL R. RAY, JR.:

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Receivership Order)¹ and the receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case” or the “Receivership”), hereby files this *Motion for Expedited Consideration* (the “Motion for Expedited Consideration”) of her *Motion To Determine Extent and Validity of Interests of Albert Arbelaez* [ECF No. 248] (the “Arbelaez Motion”). The Receiver requests entry of an order, substantially in the form of the proposed order (the “Proposed Order”) attached hereto as **Exhibit A**, expediting consideration of the Arbelaez Motion on or before September 8, 2022. In support of this Motion for Expedited Consideration, the Receiver respectfully represents as follows:

I. BACKGROUND

3. On December 1, 2021, Plaintiff, the Securities and Exchange Commission (the “Commission”), filed its *Emergency Motion for a Temporary Restraining Order and Emergency Ancillary Relief* which included an application for the appointment of a receiver for the Receivership Parties [ECF No. 3].

4. On December 2, 2021, this Court determined that entry of an order appointing a receiver over the Receivership Parties was both necessary and appropriate to marshal, conserve, hold, and operate all of the Receivership Parties’ assets pending further order of this Court. Accordingly, the Court entered the *Order Appointing Receiver* (the “Receivership Order”) on

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

December 2, 2021 [ECF No. 17], appointing Deborah D. Williamson as the Receiver over the Receivership Estates in this Case. The Receivership Order directed the Receiver to take possession and control over all funds, property, and other assets in the possession of, or under the control of Receivership Parties. Receivership Order, ¶ 8.

5. On May 16, 2022, the Receiver filed her *Motion (1) for Authority to Sell Oil and Gas Interests; (2) for Authority to Retain Sales and Marketing Firm; and (3) for Approval of Sales Procedures* (the “Oil and Gas Sale Motion”) [ECF No. 197]. On June 8, 2022, this Court entered its *Order* approving the Oil and Gas Sale Motion (the “Oil and Gas Sale Order”) [ECF No. 215].

6. The Receiver has given notice of her intent to sell any interest retained by any Receivership Estate in the Kari Well and other leases in Schleicher County in accordance with the Oil and Gas Sale Order. No party has objected to such sale. The uncertainty regarding the extent of an enforceable assignment of a working interest in the Kari Well held by Dr. Albert Arbelaez (“Dr. Arbelaez”) or any other lease or other property may significantly affect both the level of interest and price which would be paid to the Receivership Estates. In accordance with the Oil and Gas Sale Order, auctions through EnergyNet.com, LLC will run from September 8, 2022 through September 15, 2022 (the “Auction Dates”).

7. The Receiver provided a copy of the Arbelaez Motion to Dr. Arbelaez on or about August 15, 2022. On August 22, 2022, the Receiver filed the Arbelaez Motion. Time is of the essence with respect to consideration and determination of the Arbelaez Motion given the Auction Dates.

II. RELIEF REQUESTED

8. The Receiver respectfully requests that the Court consider and determine the Arbelaez Motion on an expedited basis at the Court’s already-scheduled **telephonic hearing on**

September 8, 2022, at 10:00 a.m. Central. The Commission has consented to the expedited hearing. Arbelaez has not responded regarding this request.

III. CONCLUSION

9. For the foregoing reasons, the Receiver requests that this Court enter the Proposed Order granting her Motion for Expedited Consideration and setting the Arbelaez Motion for telephonic hearing on September 8, 2022, at 10:00 a.m. Central.

Dated: August 30, 2022

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 CONFERENCE

The Receiver, through the undersigned counsel, conferred with counsel for Plaintiff, Securities and Exchange Commission (the "Commission"), on August 30, 2022, regarding the relief requested in the Motion for Expedited Consideration. The Commission consents the relief requested in the Motion for Expedited Consideration. The Receiver, through her oil and gas counsel, Mr. Eric Hillerman, conferred with Dr. Albert Arbelaez regarding the relief requested in the Motion for Expedited Consideration. Dr. Albert Arbelaez has not indicated whether he consents or opposes the relief requested herein at the time of filing. The Receiver will continue to attempt to reach a resolution with Dr. Albert Arbelaez on the Arbelaez Motion and the Motion for Expedited Consideration.

/s/ Danielle N. Rushing
Danielle N. Rushing

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2022, the foregoing document was served via CM/ECF on all parties appearing in this Case, including counsel for Plaintiff, Securities and Exchange Commission and on the following unrepresented parties on this Court's docket via email:

Albert Arbelaez
310arbelaez@gmail.com

James Ikey
james.ikeyrcg@gmail.com

Bridy Ikey
bridydikey@gmail.com

IGroup Enterprises LLC
c/o James Ikey
james.ikeyrcg@gmail.com

John Muratore
c/o Theodore Grannatt
tgrannatt@mccarter.com

Muratore Financial Services, Inc.
c/o Theodore Grannatt
tgrannatt@mccarter.com

Thomas Brad Pearsey
c/o Theodore Grannatt
tgrannatt@mccarter.com

Manjit Singh (aka Roger) Sahota
Harprit Sahota
Monrose Sahota
rogersahota207@gmail.com

Sunny Sahota
sunnysanangelo@gmail.com

/s/ Danielle N. Rushing
Danielle N. Rushing

EXHIBIT A

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. 4:21-cv-1310-O-BP

**ORDER GRANTING RECEIVER’S MOTION FOR EXPEDITED CONSIDERATION
OF MOTION TO DETERMINE EXTENT AND VALIDITY
OF INTERESTS OF ALBERT ARBELAEZ [ECF NO. 248]**

Came on to be heard the Receiver’s *Motion for Expedited Consideration* (the “Motion for Expedited Consideration”)¹ of her *Motion to Determine Extent and Validity of Interests of Albert Arbelaez* [ECF No. 248] (the “Arbelaez Motion”). After considering the Receiver’s Motion for Expedited Consideration, the Court is of the opinion that said motion should be GRANTED in all respects.

IT IS THEREFORE ORDERED that the Arbelaez Motion is set for an expedited hearing via telephone on September 8, 2022, at 10:00 a.m. Central.

Signed this ___ day of _____, 2022.

HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE

¹ Capitalized terms used but not otherwise described herein shall have the meaning ascribed in the Motion.

Prepared and submitted by:

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