



**NOTICE OF PROPOSED PRIVATE SALE OF PERSONAL PROPERTY**

**This Notice of Proposed Private Sale of Personal Property (the “Notice”) relates to the private sale of certain categories and/or items of personal property (the “Property”) of the Receivership Estates. If you oppose the private sale of the Property identified in this Notice, or if you have a claim to or against the Property, you should immediately contact the undersigned counsel for Receiver Deborah D. Williamson (the “Receiver”). If you and the Receiver cannot agree, you must file a written objection (or a claim of ownership or interest in the Property, identifying the source of your claim) to the proposed sale by December 6, 2022, which is seven (7) days after the date this Notice was filed with the Court. Your objection or claim must state why the proposed sale should not be approved by the Court as to specific pieces of Property. Any objections must be filed:**

**United States District Court for the Northern District of Texas,  
Fort Worth Division  
Clerk of Court  
501 West 10th Street, Room 310  
Fort Worth, Texas 76102**

**If no party files a timely objection and no competing offers are submitted, the Receiver will be authorized to close on the sale of the 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 her intention to sell the personal property (the “Property”) identified on **Exhibit A** hereto pursuant to the procedures authorized by the Court’s June 9, 2022 *Order* (the “Order”) [ECF No. 217].

**Pursuant to the Order, any third party may make a subsequent offer of at least ten (10%) percent more than the proposed sale price listed in Exhibit A under similar terms and conditions of sale. Any competing offer must be submitted in writing to counsel for the Receiver at [drushing@dykema.com](mailto:drushing@dykema.com) by no later than December 6, 2022, which is seven (7) 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.**

In the event that (i) no timely objection or claim is filed and (ii) no timely Higher Offers are received, the Receiver has the authority, without further Order of the Court, to close on the sale of the Property and transfer possession and ownership pursuant to the sale terms.

The Receiver reserves the right to postpone or terminate the proposed sale of the Property for any reason that she deems to be in the best interests of the receivership estates.

To contact the Receiver's counsel regarding an objection or for additional information related to this Notice, please contact Danielle N. Rushing at (210) 554-5500 or [drushing@dykema.com](mailto:drushing@dykema.com).

Dated: November 29, 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 SERVICE**

I hereby certify that on November 29, 2022, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff Securities and Exchange Commission; served via first-class mail at the addresses provided below; and posted on the Receivership website at [www.heartlandreceivership.com/notices](http://www.heartlandreceivership.com/notices).

James Ikey  
103 Bayonne Drive  
Mansfield, TX 76063

Bridy Ikey  
103 Bayonne Drive  
Mansfield, TX 76063

IGroup Enterprises LLC  
c/o James Ikey  
103 Bayonne Drive  
Mansfield, TX 76063

John Muratore  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110

Muratore Financial Services, Inc.  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110

Thomas Brad Pearsey  
c/o Theodore Grannatt  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110

David Childress  
Shannon, Martin, Finkelstein, Alvarado  
& Dunne PC  
1001 McKinney, Suite 1100  
Houston, Texas 77002

Manjit Singh (aka Roger) Sahota  
Harprit Sahota  
Monrose Sahota  
Sunny Sahota  
3371 Knickbocker Road  
Unit #185  
San Angelo, Texas 76904

/s/ Danielle N. Rushing  
Danielle N. Rushing

**EXHIBIT A**

Asset Category	Description	Proposed Sale Price
Lot 116	(9572) DBL DURM/ DBL POLE WELL SERVICE RIG, P/B 6 CYL ENGINE, 6"X8" DBL POLE MAST & CABLE RASIED & SCOPED, MTD ON 1986 MACK T/A TRUCK VIN: 1M2N187Y8HA016378	\$3,500.00

The Receiver may accept funds for the sale of the Property in the manner of ACH/wire, money order, or business check, and payment shall be remitted to the Receiver’s counsel at the address in the Notice. The Receiver will consummate the sale of the Property as expeditiously as practicable and in accordance with the Court’s June 9, 2022 *Order* [ECF No. 217].