

LLC, Leading Edge Energy, LLC, Panther City Energy LLC, Sahota Capital LLC, and 1178137 BC LTD. (ECF Nos. 697 – 700, 702 – 705).

2. On December 5, 2024, the Court ordered the SEC to file any motions for final judgment in this matter on or before February 18, 2025. (ECF No. 626). On January 24, 2025, the SEC filed a motion for a 45-day extension of time to file remaining motions for final judgments by April 4, 2025 (ECF No. 666), which the Court granted on March 3, 2024 (ECF No. 693).

3. Since that time, the SEC has been diligently working towards reaching settlements with the remaining parties in this case: Defendant Sahota and Relief Defendants Monroe Sahota, Sunny Sahota, and Harprit Sahota (collectively, the “Sahotas”).

4. At this time, the contemplated settlements with the Sahotas include transferring two pieces of real property located on Cat Island in the Commonwealth of the Bahamas (the “Bahamas”) to the Court-appointed Receiver, Deborah D. Williamson (the “Receiver”). The Receiver is currently retaining Bahamian counsel to assist with, among other things, obtaining judicial “recognition” of the Receivership in the Bahamas, which must be completed before the Receiver can take possession of real estate assets situated in the Bahamas. Without the input from Bahamian counsel, the SEC does not know precisely how much time the process will take, but this process will not be completed by April 4, 2025. While the transfer of the real estate could take longer than three months, the SEC anticipates that, with the guidance of Bahamian counsel, it will be able to structure settlements such that the Court will be able to enter final judgments before the property is transferred to the Receiver.

5. Additional time is also requested because only the SEC’s Commissioners, and not SEC staff, can decide whether to settle a case or seek specific financial remedies, SEC staff

members are required to circulate a written recommendation within the SEC for review and comment, and then submit the recommendation to the SEC's Commissioners for their consideration and approval. If the SEC's Commissioners vote to accept these remaining settlement offers, the SEC will promptly move for Court approval of the settlements.

6. The foregoing constitutes good cause for granting an extension pursuant to FED.

R. CIV. P. 6(b)(1)(A).

7. This is the SEC's second request for an extension of this deadline.

8. WHEREFORE, the SEC respectfully seeks a 3-month extension of time, up to and including July 3, 2025, of the current April 4, 2025 deadline for the SEC to file any remaining motions for final judgments.

Dated: March 17, 2025

Respectfully Submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**

By: /s/ Ashley Dalmau-Holmes
Ashley Dalmau-Holmes

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CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), the undersigned counsel consulted with the Defendant, Relief Defendants, and with Receiver’s counsel, who consented to the requested extension.

/s/ Ashley Dalmau-Holmes
Ashley Dalmau-Homes

CERTIFICATE OF SERVICE

On March 17, 2025, I electronically filed the foregoing document with the clerk of court for this U.S. District Court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I have further emailed this filing to the following unrepresented parties on this Court’s docket:

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/s/ Ashley Dalmau-Holmes
Ashley Dalmau-Homes

**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, *et al.*,**

Defendants.

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Civil Action No. 4:21-cv-01310-O-BP

[PROPOSED] ORDER

Before the Court is Plaintiff’s Unopposed Motion for a 3-month Extension of Time (ECF No. 693) of the current April 4, 2025 deadline (*see* ECF No. 666) to file any motions for final judgment in this matter. Having considered the Motion, which establishes good cause to extend the deadline, the Court **GRANTS** the Motion. Plaintiff’s motions for final judgments are now due on or before July 3, 2025.

SO ORDERED on this _____ day of March 2025.

UNITED STATES DISTRICT JUDGE