

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION

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SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

JAMES A. KNAUER as the Court Appointed)
Receiver for HEARTLAND)
FINANCIAL SERVICES, INC., JMS)
INVESTMENT GROUP, LLC, ATLAS)
INCOME FUND, LLC, BMC INVESTMENT) CASE NO: 1:03-CV-0279-JDT-TAB
GROUP, LLC, DOLPHIN INTERNATIONAL)
DEVELOPMENT, LTD., BELIZE ESCROW)
SERVICES, HEARTLAND MONEY)
MANAGEMENT OF FLORIDA, INC.,)
LINCOLN FIDELITY ESCROW SERVICES,)
MDS INVESTMENT, INC., and 21ST)
CENTURY INTERNATIONAL ADVISORS,)
INC.)
)
Plaintiff,)
)
v.)
)
LESLIE REED,)
)
Defendant.)

MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE PLEADINGS

James A. Knauer, the Receiver for Heartland Financial Services Inc. and JMS Investment Group, LLC by counsel states the following for his Motion:

1. Dispositive pleadings in this matter are due on August 21, 2003.
2. Defendant Leslie Reed recently tendered responses to discovery which will require a deposition in order for the Plaintiff to have the materials he needs to file a motion for summary judgment. The Leslie Reed deposition is scheduled for September 18, 2003.
3. Counsel for the Plaintiff believes that a motion for summary judgment and related materials can reasonably be prepared and filed by October 1, 2003.

Wherefore, the Plaintiff, James A. Knauer, the Receiver for Heartland Financial Services Inc. and JMS Investment Group, LLC respectfully requests that the deadline for dispositive motions be extended to and including October 1, 2003.

KROGER, GARDIS & REGAS, LLP



Samuel D. Hodson, Atty #10842-41
Attorneys for James A. Knauer, Receiver

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317-264-6832, fax

CERTIFICATE OF SERVICE

I hereby certify that I have this 20 day of August, 2003, served a copy of the foregoing upon the following by depositing a copy of same in the United States Mail, first class, postage prepaid.

Leslie Reed
9924 Tudor Court
Fishers, IN 46038



Samuel D. Hodson

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