

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA

01 MAY 22 PM 2:50

LAURA A. BRIGGS  
CLERK

JAMES A. KNAUER as the Court Appointed )  
Receiver for HEARTLAND )  
FINANCIAL SERVICES, INC., and JMS )  
INVESTMENT GROUP, LLC, )

Plaintiff, )

CAUSE NO. IP-00-1629 C-T/G

v. )

KENNETH R. PAYNE, )  
DANIEL G. DANKER, CONSTANCE )  
BROOKS-KIEFER, JOHANN M. SMITH, )  
AERO TECHNOLOGIAS, Ltd., )  
ATLAS INCOME FUND, LLC, )  
BMC INVESTMENT GROUP, )  
LLC, CARRIBEAN FEDERAL TRUST, Ltd., )  
CARRIBEAN FEDERAL TRUST SERVICES, )  
Ltd., CARRIBEAN FINANCIAL SERVICES, )  
CARRIBEAN INVESTMENTS )  
INTERNATIONAL, Ltd. , )  
CELTIC CENTRE II, )  
Ltd., CHARMAR, Ltd., )  
DOLPHIN INTERNATIONAL )  
DEVELOPMENT, Ltd., DOLPHIN )  
PENINSULA PARTNERS, FIRST FIDELITY )  
TRUST, Ltd., FIRST INTERNATIONAL )  
LIMITED, HEARTLAND )  
INTERNATIONAL TRUST SERVICES, Ltd., )  
HEARTLAND MONEY MANAGEMENT OF )  
FLORIDA, INC., INTERNATIONAL )  
LEISURE CENTERS, INC., KJL, Ltd. OF )  
BELIZE, LINCOLN FIDELITY ESCROW )  
SERVICES, MDS INVESTMENTS, Ltd., )  
PMK, Ltd., PROVIDENT BANK, )  
RMP, Ltd., TERENS, Ltd., )  
21<sup>ST</sup> CENTURY BANKING GROUP. Ltd., )  
21<sup>ST</sup> CENTURY INTERNATIONAL BANK )  
& TRUST, Ltd. OF GRENADA, )  
21<sup>ST</sup> CENTURY INTERNATIONAL )  
ADVISORS, INC., 21<sup>ST</sup> CENTURY )  
INTERNATIONAL ADVISORS OF )  
BERMUDA, Ltd., 21<sup>ST</sup> CENTURY )

INTERNATIONAL ADVISORS OF )  
 IRELAND, Ltd., 21<sup>ST</sup> CENTURY )  
 PERSONNEL, LLC, UNIVERSAL )  
 FINANCIAL SERVICES, LTD. and )  
 JOHN DOES 1-20, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME**  
**TO RESPOND TO DEFENDANT, CONSTANCE BROOKS-KIEFER'S,**  
**MOTION TO DISMISS**

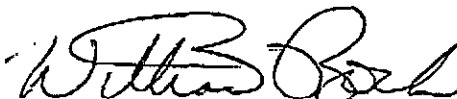
Comes now the Plaintiff, James A. Knauer ("Plaintiff"), by counsel, and respectfully moves the Court for a thirty (30) day extension of time up to, and including, Thursday, June 21, 2001, in which to respond to Defendant, Constance Brooks-Kiefer's, Motion to Dismiss. In support of his motion, the Plaintiff would show the Court as follows:

1. On or about May 7, 2001 Plaintiff was served with Defendant, Constance Brooks-Kiefer's ("Defendant"), Motion to Dismiss.
2. Plaintiff's response to Defendant's Motion is presently due on May 22, 2001, and said time has not yet expired.
3. Counsel for the Plaintiff reasonably requires additional time in order to fully frame his response to Defendant's Motion to Dismiss.
4. The Plaintiff requests a thirty (30) day extension of time up to, and including, Thursday, June 21, 2001, in which to respond to Defendant's Motion to Dismiss.
5. The extension of time requested herein has not been requested for the purpose of delay and will not prejudice any party herein.

WHEREFORE, the Plaintiff, James A. Knauer, by counsel, respectfully requests that the Court grant a thirty (30) day extension of time up to, and including, Thursday, June 21, 2001, in which to respond to Defendant's Motion to Dismiss, and for all other relief proper in the premises.

Respectfully submitted,

**KROGER, GARDIS & REGAS, LLP**

By:   
William Bock, III, Attorney No. 14777-49  
Counsel for James A. Knauer, Plaintiff

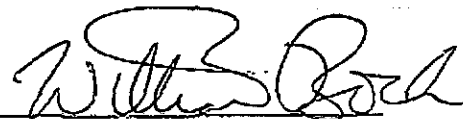
**KROGER, GARDIS & REGAS, LLP**  
111 Monument Circle, Suite 900  
Indianapolis, Indiana 46204-5125  
Telephone: (317) 692-9000  
Facsimile: (317) 264-6832

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been served upon the following parties by placing a copy of the same in the United States Mail, first class postage pre-paid, on this 22<sup>nd</sup> day of May, 2001:

Stephen W. Dillon  
Ross G. Thomas  
Dillon Law Office  
3601 North Pennsylvania Street  
Indianapolis, Indiana 46205-3435

Kenneth Payne  
Marion County Jail  
220 East Maryland Street  
Indianapolis, Indiana 46204

  
William Bock, III