

FILED  
U.S. DISTRICT COURT  
INDIANAPOLIS DIVISION

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA 02 FEB 13 PM 3:42  
INDIANAPOLIS DIVISION

SOUTHERN DISTRICT  
OF INDIANA  
LAURA A. BRIGGS  
CLERK

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

Plaintiffs, )

vs. )

JONATHON ROBERTS FINANCIAL )  
GROUP, INC., )  
ALLIANCE CAPITAL MANAGEMENT )  
CORP., )  
ANDOVER SECURITIES, INC., )  
FSC SECURITIES CORPORATION, and )  
FFP SECURITIES, INC., )

Defendants. )

CAUSE NO. IP01-1168-C K/T

**UNOPPOSED JOINT MOTION FOR ENLARGEMENT OF TIME**

Come now Defendants, Jonathon Roberts Financial Group, Inc., Alliance Capital Management Corporation, FSC Securities Corporation, and FFP Securities, Inc., by counsel, and move the Court for a seven (7) day enlargement of time through and including February 21, 2002, within which to file their replies in support of their Motions to Dismiss, and in support thereof show the Court as follows:

1. Each Defendant filed its separate Motion to Dismiss in early October 2001 (FFP Securities, Inc. on October 5, 2001; Jonathan Roberts Financial Group, Inc. and Alliance Capital Management Corporation on October 9, 2001; and FSC Securities Corporation on October 9, 2001).

2. Plaintiff obtained extensions of time and filed its consolidated oversized response brief on January 17, 2002.

*cc: WB*

*4/2*

3. At the January 11, 2002, pre-trial conference, Defendants requested that the Court allow them thirty (30) days within to file their reply briefs, which was granted by the Court in its Order dated January 14, 2002 that Defendants' replies would be filed by February 14, 2002.

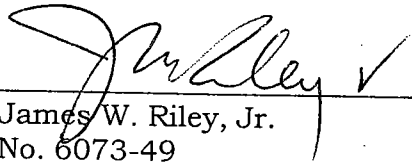
4. Defendants reasonably require an additional seven (7) days to coordinate their replies to eliminate repetitive argument.

5. This Motion is not made for purposes of delay, nor will Plaintiff be prejudiced by this extension, nor will the development of this case be adversely affected by this extension.

6. Plaintiff has no objection to this short extension for Defendants to file their replies in support of their Motions to Dismiss.

WHEREFORE, Defendants, Jonathon Roberts Financial Group, Inc., Alliance Capital Management Corporation, FSC Securities Corporation, and FFP Securities, Inc., pray that the Court grant them a seven (7) day extension, through and including February 21, 2002 within which to file their replies in support of their Motions to Dismiss, and for all other relief proper in the premises.

Respectfully submitted on behalf  
of all Defendants for purposes of this  
Motion only

  
\_\_\_\_\_  
James W. Riley, Jr.  
No. 6073-49  
RILEY BENNETT & EGLOFF, LLP  
One American Square  
Box 82035  
Indianapolis, IN 46282  
(317) 636-8000  
(317) 636-8027 (fax)

BRYAN CAVE LLP  
One Metropolitan Square  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102-2750  
(314) 259-2000  
(314) 259-2020 (fax)

Attorneys for Defendant  
FFP Securities, Inc.

Thomas E. Wheeler, II  
LOCKE REYNOLDS LLP  
1000 Capital Center South Tower  
201 North Illinois Street  
Indianapolis, IN 46204-4210

Attorneys for Defendants  
Jonathan Roberts Financial Group,  
Inc. and Alliance Capital Management  
Corporation

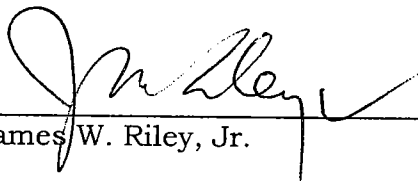
William L. O'Connor  
KIGHTLINGER & GRAY  
151 North Delaware Street  
Market Square Center, Suite 660  
Indianapolis, IN 46204

Attorneys for Defendant  
FSC Securities Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing *Unopposed Motion for Enlargement of Time* has been served this 13<sup>th</sup> day of February, 2002, via First Class United States Mail, postage prepaid, upon:

William Bock III  
Reynolds B. Brissenden  
Kroger Gardis & Regas  
Bank One Center/Circle  
111 Monument Circle, #900  
Indianapolis, IN 46204

  
James W. Riley, Jr.

JWR/6008.110/RSA/5160-1/CLIENT