

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
JUN 19 PM 4:10
LAURA A. BRIGGS

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

Plaintiff,)

CAUSE NO. IP01-1168-C-T/K

v.)

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

Defendants.)

SECOND MOTION TO EXTEND DEADLINE FOR AMENDING PLEADINGS

Comes now James A. Knauer as Court Appointed Receiver for Heartland Financial Services, Inc. and JMS Investment Group, LLC, by counsel, to request an extension for filing amended pleadings and in support of such sets forth the following:

1. Parties entered into Case Management Plan setting the deadline for amending pleadings for April 20, 2002.
2. On or about April 18, 2002, parties agreed and stipulated to extending the deadline up to and including May 20, 2002.
3. On May 13, 2002, Plaintiff served counsel for FSC Securities Corporation a set of discovery pertaining to its acquisition of Andover Securities, Inc.

4. Thereafter, Plaintiff moved for and obtained an extension of time to amend pleadings.

5. FSC Securities Corporation has not responded to the discovery requests.

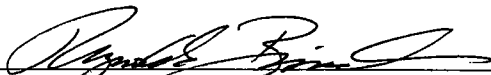
6. Plaintiff is in need of additional time so as to receive and evaluate FSC Securities Corporation's response to discovery requests for purposes of determining whether or not to amend his Complaint.

7. Such an extension of time will not delay the proceedings in this case nor will it prejudice Defendants in any way.

WHEREFORE, Plaintiff, James A. Knauer, Receiver, by counsel, respectfully requests the Court to extend the deadline for amending pleadings by an additional thirty (30) days.

Respectfully submitted,

KROGER, GARDIS & REGAS, LLP

By: 
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of June, 2002, a true and accurate copy of the above and foregoing pleading was served by depositing the same in the United States mail, first class, postage prepaid to:

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