

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

HEARTLAND CO-OP, Plaintiff, v. SHALLOW CREEK LAND & LIVESTOCK LLC, AND DEREK WULF, Defendants.	Case No. LACL166413 APPLICATION FOR DEFAULT ENTRY AGAINST DEFENDANTS
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COMES NOW Plaintiff, Heartland Co-op (“**Heartland**”), by and through its attorney, Jeffrey W. Courter of the law firm of Nyemaster Goode, P.C., and in support of its Application for Default Entry (“**Application**”) against Defendants, Shallow Creek Land & Livestock LLC (“**Company**”); and Derek Wulf (“**Wulf**”) (collectively the “**Defendants**”), and states to the Court the following:

1. This case was commenced in this Court on April 20, 2026, by the filing of the Petition (D0001).
2. Defendants were served on May 2, 2026, respectively, via an Affidavit of Service filed by Kristin Schulz of HSPS Legal Services on May 5, 2026 (D0005-D0006).
3. No answer, appearance, motion or special appearance was filed on behalf of any of the Defendants within twenty (20) days from the date of service upon them.
4. None of the Defendants are incarcerated in any prison or jail, nor are under any disability of any kind or nature whatsoever, are not in the military service, and are not entitled to any rights, benefits, or relief under the Soldiers’ & Sailors’ Civil Relief Act, 50 U.S.C. Appx. §§ 501, et. seq., or under any other similar moratorium or relief law, and default judgment should be entered against them.

5. Pursuant to the requirements of Iowa Rule of Civil Procedure 1.972(2)(a), the undersigned hereby certifies a written Notice of Intent to File Written Application for Default was mailed to each of the Defendants on May 26, 2026 (collectively the “**Notices**”). True and accurate copies of the Notices are marked as Exhibits A-B, respectively, attached hereto as required under Rule 1.972(2), and incorporated herein by reference. The undersigned’s Certification is set forth below.

6. Plaintiff attaches hereto the Affidavit of Docket Inspection by its attorney, which is marked as Exhibit C and incorporated herein, in support of this Application and which shows that none of the Defendants have filed an Answer or responsive pleading as of June 6, 2026.

7. Assuming the Court grants Lender’s Application, Lender will file with seven (7) days thereafter an Application for Attorney Fees and Expenses, and submit to the Court a proposed Order and Decree.

WHEREFORE, Plaintiff, Heartland Co-op, requests the Court to declare all of the Defendants in default for want of appearance and answer, and that said Defendants’ default be entered of record. Lender further prays for such relief as the Court deems just and equitable.

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By: /s/ Jeffrey W. Courter
Jeffrey W. Courter

AT0001740

**ATTORNEYS FOR PLAINTIFF,
HEARTLAND CO-OP**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing document was served by U.S. Mail to the parties listed above, by enclosing the same in an envelope addressed to each such party at the addresses listed, with postage fully paid, and by depositing said envelope in a United States Post Office depository in Des Moines, Iowa on the 8th day of June, 2026.

Shallow Creek Land & Livestock LLC
c/o Derek Wulf, Managing Member
9212 Holmes Rd.
Hudson, IA 50643

Derek Wulf
9212 Holmes Rd.
Hudson, IA 50643

/s/ Debra Carle_____