

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

WCF FINANCIAL BANK,

Plaintiff,

v.

DEREK N. WULF; DRESDEN D. WULF;
SHALLOW CREEK LAND AND
LIVESTOCK, LLC; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC. (MERS), AS NOMINEE FOR
LINCOLN SAVINGS BANK; NEW
CENTURY FS, A DIVISION OF
GROWMARK, INC.; U.S. BANK
NATIONAL ASSOCIATION dba ELAN
FINANCIAL SERVICES; BLACK HAWK
COUNTY, IOWA; AND UNKNOWN
PERSONS IN POSSESSION,

Defendants.

CASE NO. EQCV157348

**JOINT MOTION TO CONTINUE
HEARING ON APPLICATION FOR
APPOINTMENT OF RECEIVER**

COME NOW Plaintiff WCF Financial Bank ("WCF") and Defendants Derek N. Wulf, Dresden D. Wulf, and Shallow Creek Land and Livestock, LLC (the "Wulf Defendants"), by and through their respective undersigned counsel, and jointly move the Court to continue the hearing on Count VI of the Verified Petition (Application for Appointment of Receiver), stating:

1. A hearing on WCF's Application for Appointment of Receiver is presently scheduled for July 17, 2026.
2. The parties have been engaged in ongoing discussions regarding the conditional resolution of the receivership application and the refinancing of the obligations at issue in this action.
3. On July 16, 2026, counsel for the Wulf Defendants provided WCF with a written term sheet from an identified lender concerning the proposed refinancing of the obligations at issue. The parties are working toward the delivery of a conditional commitment letter from that lender.

4. To permit that process to proceed without the expense of a contested hearing, the parties jointly request that the July 17, 2026 hearing be continued to a date convenient for the Court during the week of August 3, 2026.

5. WCF's Application for Appointment of Receiver remains pending and is not withdrawn; the parties request that it remain set for hearing on the continued date.

6. This motion is made in good faith and not for purposes of delay, and no party will be prejudiced by the requested continuance.

WHEREFORE, the parties jointly and respectfully request that the Court continue the hearing on WCF's Application for Appointment of Receiver to a date on or after August 3, 2026, convenient to the Court, that the Application remain pending, and that the Court grant such other relief as is just and equitable.

Respectfully submitted,

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ATTORNEY FOR DEFENDANTS DEREK N. WULF, DRESDEN D. WULF, AND
SHALLOW CREEK LAND AND LIVESTOCK, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on July 16, 2026, the foregoing was electronically filed with the Clerk of Court using the Iowa Electronic Document Management System, which will serve notice of electronic filing upon all counsel of record, and that a copy was served by U.S. Mail upon each party not registered with EDMS pursuant to Iowa Ct. R. 16.315(2).

/s/Jenna Peterson