

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	DATE FILED: September 7, 2018 1:30 PM FILING ID: 3E338B4A2171B CASE NUMBER: 2018CV33011
Plaintiff: GERALD ROME, Securities Exchange Commissioner for the State of Colorado v. Defendants: GARY DRAGUL, GDA REAL ESTATE SERVICES, LLC, and GDA REAL ESTATE MANAGEMENT, LLC	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Attorneys for Receiver: Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Rachel A. Sternlieb, #51404 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout St., Suite 1100 Denver, Colorado 80202 Phone Number: (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com rsternlieb@allen-vellone.com	Case Number: 2018CV33011 Division/Courtroom: 424
RECEIVER'S NOTICE CONCERNING EMPLOYMENT OF ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.	

Harvey Sender, the duly-appointed Receiver in the above-captioned case, hereby gives notice he has employed Patrick D. Vellone, Michael T. Gilbert, and Rachel A. Sternlieb of the law firm, Allen Vellone Wolf Helfrich & Factor P.C., as counsel to represent him in this matter.

1. On August 15, 2018, Gerald Rome, Securities Commissioner for the State of Colorado (the "Commissioner"), filed his Complaint for Injunctive and Other Relief against Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC (collectively, "Dragul and the DGA Entities").

2. On August 30, 2018, the Court entered its Order Appointing Receiver (“Receivership Order”) which appointed Harvey Sender of Sender & Smiley LLC as receiver for Dragul and the DGA Entities, as well as for their respective properties and assets, and interests and management rights in related affiliated and subsidiary businesses (the “Receivership Estate” or the “Estate”). Receivership Order at p. 2, ¶ 5.

3. The Receivership Order gives the Receiver the authority to “hire and pay general counsel, accounting, and other professionals as may be reasonably necessary to the proper discharge of the Receiver’s duties, and to hire, pay and discharge the personnel necessary to fulfill the obligations of the Receiver hereunder, including the retention of . . . other third parties to assist the Receiver in the performance of its duties hereunder, all within the Receiver’s discretion[.]” Receivership Order at p. 9, ¶ 13(1).

4. The Receiver hereby gives notice that he has retained Patrick D. Vellone, Michael T. Gilbert, and Rachel A. Sternlieb of the law firm, Allen Vellone Wolf Helfrich & Factor P.C., as his counsel to assist in him in administering the Receivership Estate. Mr. Vellone, Mr. Gilbert and Ms. Sternlieb will assist in establishing a claims administration process, identifying and liquidating estate assets, preparing reports concerning the Estate, preparing a plan of distribution, and handling all other matters necessary to the administration of the Estate.

DATED this 7th day of September 2018.

Respectfully Submitted,

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.


By: s/ Rachel A. Sternlieb

Patrick D. Vellone, Reg. No. 15284

Michael T. Gilbert, Reg. No. 15009

Rachel A. Sternlieb, Reg. No. 51404

ATTORNEYS FOR THE RECEIVER, HARVEY SENDER

CERTIFICATE OF SERVICE

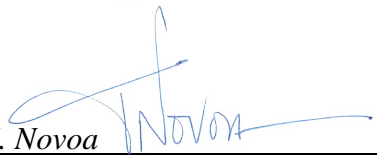
The undersigned hereby certifies that on the 7th day of September 2018, a true and correct copy of **Receiver’s Notice Concerning Employment of Allen Vellone Wolf Helfrich & Factor P.C.** was filed and served via the Colorado Courts E-Filing system to the following:

Cynthia H. Coddman, Esq.
Robert Finke, Esq.
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Denver, CO 80203

**ATTORNEYS FOR PLAINTIFF, GERALD ROME,
SECURITIES COMMISSIONER FOR THE STATE
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**ATTORNEYS FOR DEFENDANTS, GARY
DRAGUL, GDA REAL ESTATE SERVICES,
LLC AND GDA REAL ESTATE
MANAGEMENT, LLC**


s/ Terri M. Novoa
Terri M. Novoa

In accordance with C.R.C.P. 121 § 1-26(7), a printed copy of this document with original signatures is being maintained by the filing party and will be made available for inspection by other parties or the Court upon request.



INTERNAL SSC MEMORANDUM

<p><u>Scanned/</u>Saved) Save/scanned to e-file) Save Signature to pleading) Save to Index</p>	
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<p><u>Notes:</u></p>	