

<p>DISTRICT COURT, COUNTY OF DENVER  STATE OF COLORADO  1437 Bannock Street, Room 256  Denver, Colorado 80202  Phone Number: 720.865.7800</p>	<p>DATE FILED: September 7, 2018 1:13 PM  FILING ID: 59C938FFDD8B3  CASE NUMBER: 2018CV33011</p>
<p><b>GERALD ROME, Securities Commissioner for  the State of Colorado,</b></p> <p><b>Plaintiff,</b></p> <p><b>v.</b></p> <p><b>GARY DRAGUL, GDA REAL ESTATE SERVICES,  LLC,  and GDA REAL ESTATE MANAGEMENT, LLC,</b></p> <p><b>Defendants.</b></p>	<p><b>Δ COURT USE ONLY Δ</b></p> <hr/> <p>Case Number: 2018CV33011</p> <p>Courtroom: 424</p>
<p>SPRINGER AND STEINBERG, P.C.  Jeffrey A. Springer, Esq. (Bar No. 6793)  1600 Broadway, Suite 1200  Denver, Colorado 80202  Tel: 303.861.2800  Fax: 303.832.7116  Email: jspringer@springersteinberg.com  ATTORNEYS FOR DEFENDANTS</p>	
<p><b>UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE  RESPOND TO COMPLAINT</b></p>	

COME NOW, Defendants Gary Dragul, GDA Real Estate Services, LLC and GDA Real Estate Management, LLC, by and through their counsel of record, Jeffrey A. Springer of Springer and Steinberg, P.C., hereby submit their Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Complaint as follows:

**CERTIFICATE OF CONFERRAL PURSUANT TO C.R.C.P. 121, § 1-15(8)**

On September 7, 2018 undersigned counsel conferred with Attorney General Sueanna Johnson regarding the relief requested herein and she advised that the Plaintiff does not object to the extension.

**GROUND FOR THE MOTION:**

1. The current deadline for Defendants to file and serve their Answer or otherwise respond to the Complaint is September 7, 2018.
2. The Defendants request an extension of time to file and serve their Answer or otherwise respond to the Complaint of 30 days or until October 7, 2018.
3. An extension of time will not prejudice the parties in any way and will allow for the possibility of settlement discussions to take place.
4. The additional time requested is reasonable and limited. **Further, the Plaintiff in this litigation does not object.**
5. Injunctive relief for the Plaintiff remains in place and therefore, granting the Defendants' request will not prejudice any party or the Court.
6. Because of pendency of a related criminal case against the Defendant Gary Dragul, the Defendants request additional time to assess how to respond to this Complaint.

**WHEREFORE,** Defendants respectfully requests that this Court extend the deadline to submit their Answer or otherwise respond to the Complaint until October 7, 2018, respectively, and for such other and further relief as the Court deems just and proper in the premises.

Respectfully submitted this 7<sup>th</sup> day of September, 2018,

SPRINGER AND STEINBERG, P.C.

By:           /s/ Jeffrey A. Springer            
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ATTORNEYS FOR DEFENDANTS

*Original signature on file at the  
Springer and Steinberg, P.C.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this 7<sup>th</sup> day of September, 2018, the above and foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** was filed with the Court and a true and accurate copy of the same was served via ICCES to:

Robert Finke  
Sueanna Johnson  
Matthew Bouillon Mascarenas  
Assistant Attorney Generals  
1300 Broadway, 8<sup>th</sup> Floor  
Denver, Colorado 80203

          /s/ Michaela Lloyd            
Michaela Lloyd

*Original signature on file at the  
Springer and Steinberg, P.C.*

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<b>ORDER RE: UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT</b>	

THE COURT having reviewed the Defendants' Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Complaint, the file related hereto and considering itself fully informed does hereby Order:

The Defendant's Motion for Extension is Granted. Defendants shall have until October 7, 2018 to Answer or otherwise respond to the Complaint.

BY THE COURT this \_\_\_\_\_ day of \_\_\_\_\_, 2018

\_\_\_\_\_  
 District Court Judge



**INTERNAL SSC MEMORANDUM**

<p><b>Scanned/Save</b>  ) Save/scanned to e-file  ) Save Signature to pleading  ) Save to Index</p>	
<p><b>Sent to Client on:</b>  <b>By:</b></p>	
<p><b>Calendared:</b>  <b>By:</b></p>	<p>OR</p>
<p><b>Notes:</b></p>	