DISTRICT COURT, DENVER COUNTY, COLORADO

Court Address:

1437 Bannock Street, Rm 256, Denver, CO, 80202

DATE FILED: October 5, 2018 10:39 AM Plaintiff(s) GERALD ROME SECURITIES COM FOR THE ST OF

CASE NUMBER: 2018CV33011

Defendant(s) GARY DRAGUL et al.

 $\triangle$  COURT USE ONLY  $\triangle$ 

Case Number: 2018CV33011 Division: 424 Courtroom:

Order: Second Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Complaint

The motion/proposed order attached hereto: GRANTED.

Issue Date: 10/5/2018

Most Egen

MARTIN FOSTER EGELHOFF

District Court Judge

DISTRICT COURT, COUNTY OF DENVER

STATE OF COLORADO

1437 Bannock Street, Room 256

Denver, Colorado 80202

Phone Number: 720.865.7800

**GERALD ROME, Securities Commissioner for the State of Colorado,** 

Plaintiff,

v.

GARY DRAGUL, GDA REAL ESTATE SERVICES,

LLC,

and GDA REAL ESTATE MANAGEMENT, LLC,

Defendants.

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  $\Delta$  COURT USE ONLY  $\Delta$ 

Case Number: 2018CV33011

Courtroom: 424

## SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

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 Second 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 October 3, 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.

**GROUNDS FOR THE MOTION:** 

1. The current deadline for Defendants to file and serve their Answer or otherwise respond to

the Complaint is October 7, 2018.

2. The Defendants request an extension of time to file and serve their Answer or otherwise

respond to the Complaint of 8 days or until October 15, 2018.

3. An extension of time will not prejudice the parties in any way and will allow for the

continued discussions with the Attorney General regarding the possibility of resolution 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.

WHEREFORE, Defendants respectfully requests that this Court extend the deadline to

submit their Answer or otherwise respond to the Complaint until October 15, 2018, respectively,

and for such other and further relief as the Court deems just and proper in the premises.

Respectfully submitted this 4<sup>th</sup> day of October, 2018,

SPRINGER AND STEINBERG, P.C.

By: \_\_\_\_\_/s/ Jeffrey A. Springer\_

Jeffrey A. Springer, #6793

ATTORNEYS FOR DEFENDANTS

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

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this 4<sup>th</sup> day of October, 2018, the above and foregoing **SECOND 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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