

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202</p>	<p>DATE FILED: November 2, 2018 1:28 AM FILING ID: CD1F841552C5C CASE NUMBER: 2018CV33011</p> <p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Plaintiff: GERALD ROME, Securities Exchange Commissioner for the State of Colorado</p> <p>v.</p> <p>Defendants: GARY DRAGUL, GDA REAL ESTATE SERVICES, LLC, and GDA REAL ESTATE MANAGEMENT, LLC</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<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 E-mail: pvellone@allen-vellone.com E-mail: mgilbert@allen-vellone.com E-mail: rsternlieb@allen-vellone.com</p>	<p>RECEIVER’S NOTICE CONCERNING EMPLOYMENT OF WALDREP LAW, LLP</p>

Harvey Sender, the duly-appointed Receiver in this case, hereby gives notice that he has employed Thomas W. Waldrep, Jr., John P. McNames and John R. Van Swearingen of the law firm, Waldrep Law, LLP, as local counsel in North Carolina to represent him in matters concerning property of the receivership that is located in North Carolina.

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.

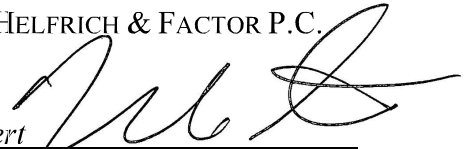
3. The Receivership Order gives the Receiver the authority to “hire and pay general counsel, accounting, and other professionals as may be reasonably necessary to the proper discharge of the Receiver’s duties, and to hire, pay and discharge the personnel necessary to fulfill the obligations of the Receiver 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 has retained Thomas W. Waldrep, Jr., John P. McNames and John R. Van Swearingen of the law firm, Waldrep Law, LLP, 101, S. Stratford Road, Suite 210, Winston-Salem, NC, 27104, Tel: 336.717.1309, as local counsel in North Carolina to assist him in administering Receivership Estate assets located in North Carolina, namely the Hickory Corners Shopping Center in Hickory, North Carolina. Mr. Waldrep, Mr. McNames and Mr. Van Swearingen have been retained to advise the Receiver on North Carolina law, procedure, and in litigating a foreclosure action filed by Dynasty, LLC seeking to foreclose on assets of the Receivership Estate.

Dated: November 2, 2018.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

By: s/ Michael T. Gilbert



Patrick D. Vellone, Reg. No. 15284
Michael T. Gilbert, Reg. No. 15009
Rachel A. Sternlieb, Reg. No. 51404
1600 Stout Street, Suite 1100
Denver, Colorado 80202
Tel: (303) 534-4499
E-mail: pvellone@allen-vellone.com
E-mail: mgilbert@allen-vellone.com
E-mail: rsternlieb@allen-vellone.com

ATTORNEYS FOR THE RECEIVER, HARVEY SENDER

CERTIFICATE OF SERVICE

I certify that on November 2, 2018, a true and correct copy of **Receiver's Notice Concerning Employment of Waldrep Law, LLP** was filed and served via the Colorado Courts E-Filing system to the following:

Robert Finke, Esq.
Sueanna P. Johnson, Esq.
Matthew J. Bouillon Mascarenas
Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 8th Floor
Financial and Health Services Unit
Denver, CO 80203

**ATTORNEYS FOR PLAINTIFF, GERALD ROME,
SECURITIES COMMISSIONER FOR THE STATE
OF COLORADO**

Jeffrey A. Springer, Esq.
Springer & Steinberg P.C.
1600 Broadway Street, Suite 1200
Denver, CO 80202

**ATTORNEYS FOR DEFENDANTS, GARY
DRAGUL, GDA REAL ESTATE SERVICES,
LLC AND GDA REAL ESTATE
MANAGEMENT, LLC**

s/Yvonne M. Davis

Yvonne M. Davis

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.