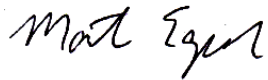


DISTRICT COURT, DENVER COUNTY, COLORADO	
Court Address: 1437 Bannock Street, Rm 256, Denver, CO, 80202	
<b>Plaintiff(s)</b> GERALD ROME SECURITIES COM FOR THE ST OF CO v. <b>Defendant(s)</b> GARY DRAGUL et al.	DATE FILED: December 18, 2018 8:13 AM CASE NUMBER: 2018CV33011  <p style="text-align: center;">△ COURT USE ONLY △</p> Case Number: 2018CV33011 Division: 424      Courtroom:
<b>Order: First Application for Professional Fees and Expenses (w/attach)</b>	

The motion/proposed order attached hereto: SO ORDERED.

Issue Date: 12/18/2018



MARTIN FOSTER EGELHOFF  
District Court Judge

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	Attachment to Order - 2018CV33011  ▲ COURT USE ONLY ▲
<b>Plaintiff:</b> GERALD ROME, Securities Commissioner for the State of Colorado  v.  <b>Defendants:</b> GARY DRAGUL, GDA REAL ESTATE SERVICES, LLC, and GDA REAL ESTATE MANAGEMENT, LLC	
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 (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com rsternlieb@allen-vellone.com	Case Number: 2018CV33011  Division/Courtroom: 424
<b>FIRST APPLICATION FOR PROFESSIONAL FEES AND EXPENSES</b>	

Harvey Sender, the duly-appointed receiver (“Receiver”) for Gary Dragul (“Dragul”), GDA Real Estate Services, LLC, GDA Real Estate Management, LLC, and related entities (collectively, “Dragul and the GDA Entities”), submits this First Application for Fees and Expenses (the “Application”).

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.

2. On August 30, 2018, the Court entered its Order Appointing Receiver (“Receivership Order”), which appointed Harvey Sender Receiver for Dragul (limited to the definition of the “Receivership Property” or “Receivership Estate” as defined in the Receivership Order), GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC.

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(l).

4. This Application covers the period from August 30, 2018, through November 30, 2018, and requests the following fees and expenses, which are specifically set forth in **Exhibits A-D**:

<b>Exhibit</b>	<b>Applicant</b>	<b>Amount Requested</b>
A	HARVEY SENDER, RECEIVER	\$120,680.00 <sup>1</sup>
B	ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.	\$201,033.77 <sup>2</sup>
C	RUBINBROWN LLP	\$68,938.51 <sup>3</sup>
D	WALDREP LLP	\$2,251.00 <sup>4</sup>
<b>Total</b>		\$392,903.28

<sup>1</sup> This includes professional fees only. The Receiver will submit incurred expenses in the next fee application.

<sup>2</sup> This includes legal fees of \$196,749.75 and out-of-pocket expenses of \$4,284.02.

<sup>3</sup> This includes professional fees of \$68,121.25 and out-of-pocket expenses of \$817.26.

<sup>4</sup> This includes legal fees only.

5. Court approval of any motion filed by the Receiver shall be given as a matter of course unless a party objects within ten days after service. This Application and its Exhibits are available at [www.dragulreceivership.com](http://www.dragulreceivership.com).

Dated: December 6, 2018.

ALLEN VELLONE WOLF HELERICH & FACTOR P.C.

  
By: /s/ Michael T. Gilbert

Patrick D. Vellone, #15284

Michael T. Gilbert, #15009

Rachel A. Sternlieb, #51404

ATTORNEYS FOR THE RECEIVER

Attachment to Order #2018CV33014

**CERTIFICATE OF SERVICE**

I certify that on December 6, 2018, a true and correct copy of the **First Application for Professional Fees and Expenses** was filed and served via the Colorado Courts E-Filing system to the following:

Robert W. Finke  
Sueanna P. Johnson  
Matthew J. Bouillon Mascareñas  
Ralph L. Carr Judicial Building  
1300 Broadway, 8th Floor  
Denver, Colorado 80203

*Counsel for Gerald Rome, Securities  
Commissioner*

Jeffery A. Springer, Esq.  
Springer and Steinberg P.C.  
1600 Broadway, Suite 1200  
Denver, Colorado 80202

*Counsel for Defendants, Gary Dragul,  
GDA Real Estate Services, LLC and  
GDA Real Estate Management, LLC*

**CERTIFICATE OF SERVICE ON KNOWN CREDITORS**

A copy of the **First Application for Professional Fees and Expenses** will also be served by email (where the Receiver has email addresses), and/or by U.S. mail first-class, postage-prepaid (for those whose email addresses are unknown), to all currently known creditors of, and all investors in, the Receivership Estate. These addresses are set forth on the service list maintained in the Receiver's records.

By: /s/ Terri M. Novoa 