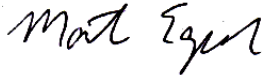


DISTRICT COURT, DENVER COUNTY, COLORADO		<p style="text-align: right;">DATE FILED: January 10, 2019 11:30 AM CASE NUMBER: 2018CV33011</p>
<p>Court Address: 1437 Bannock Street, Rm 256, Denver, CO, 80202</p>		
<p>Plaintiff(s) GERALD ROME SECURITIES COM FOR THE ST OF CO et al. v. Defendant(s) GARY DRAGUL et al.</p>		<p style="text-align: center;">△ COURT USE ONLY △</p> <p>Case Number: 2018CV33011 Division: 424 Courtroom:</p>
<p>Order: UNOPPOSED MOTION TO INTERVENE w/ATTACH (FILED ON BEHALF OF MARTIN ROSENBAUM, MELISSA ROSENBAUM, ADAM ROSENBAUM, LEORA ROSENBAUM AND AARON STEINBERG)</p>		

The motion/proposed order attached hereto: GRANTED.

Issue Date: 1/10/2019



MARTIN FOSTER EGELHOFF
District Court Judge

FILED IN DENVER
DISTRICT COURT
DENVER, COLORADO

19 JAN -9 PM 2:38

District Court, County of Denver, State of Colorado
1437 Bannock Street, Room 256
Denver, Colorado 80202
Telephone: (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

John O'Brien (#15183)
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Attorney for the Rosenbaum Family

▲ COURT USE ONLY ▲

Case Number: 2018CV33011

Ctrm: 424

UNOPPOSED MOTION TO INTERVENE

Martin Rosenbaum, Melissa Rosenbaum, Adam Rosenbaum, Leora Rosenbaum, and Aaron Steinberg (collectively, the "Rosenbaum Family") by and through their attorneys, John O'Brien and Spencer Fane LLP, for their Unopposed Motion To Intervene state as follows:

1. The Rosenbaum Family has substantial investments in limited liability companies which are now property of, or controlled by the Receivership Estate.
2. In addition, the Rosenbaum Family has extended credit, the repayment of which is being administered by the Receivership estate.

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3. The Rosenbaum Family intends to file one or more claims against the Receivership Estate prior to the February 1, 2019 claim bar date.

4. The Receiver has informed the Rosenbaum Family, through their counsel, that the Receiver is working on transactions that are likely to affect the Rosenbaum Family's interests in various limited liability companies, and the Receiver's activities will be the subject of one or more filings with this court.

5. The Rosenbaum Family's counsel needs to enter an appearance to receive timely notifications of the Receiver's and other parties' filings in this case which affect the Rosenbaum Family's substantial interest in the Receivership Estate. However, an Entry of Appearance for this purpose apparently requires an Order permitting intervention.

6. The Rosenbaum Family is entitled to intervene as a matter of right pursuant to Rule 24(a) because they have a substantial interest in the property of the Receivership estate which is the subject of this case and is so situated that the disposition of the property and this action may as a practical matter impair or impede their ability to protect that interest, and the Rosenbaum Family's interest is not adequately represented by existing parties.

7. Alternatively, the Rosenbaum Family is entitled to intervene pursuant to Rule 24(b) because the Rosenbaum Family's claims in this case have common questions of fact and law with the receiver's duties in this case. The Rosenbaum Family's intervention will not delay or prejudice the adjudication of the rights of the original parties in this case.

8. At the present time, the Rosenbaum Family's pleading setting forth their claim or defense is limited to the entry of appearance requesting notification of the filings in this case attached hereto as Exhibit 1, to include receiver's reports and the receiver's proposals concerning disposition of receivership assets.

9. The receiver has indicated that the he does not oppose the Rosenbaum Family's intervention and entry of appearance.

10. Accordingly, the Rosenbaum Family moves the court for an order allowing intervention.

WHEREFORE, the Rosenbaum Family respectfully requests the Court to enter its order granting the Unopposed Motion to Intervene.

Dated this 9th day of January, 2019.

Respectfully submitted,

SPENCER FANE LLP



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Attorney for the Rosenbaum Family

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2019 a copy of the foregoing **MOTION TO INTERVENE** was served via U.S. Mail first class postage prepaid on the following:

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Meghan Grigar