

<p>DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202</p>	
<p>Plaintiff: Chris Myklebust, Securities 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 style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Attorneys for Receiver:</p> <p>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 No.: (303) 534-4499 E-mail: pvellone@allen-vellone.com E-mail: mgilbert@allen-vellone.com E-mail: rsternlieb@allen-vellone.com</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p style="text-align: center;">RECEIVER’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN FURTHER SUPPORT OF MOTION FOR ORDER AUTHORIZING SALE OF HICKORY CORNERS</p>	

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”), hereby requests a seven (7) day extension of time in which to file its reply in further support of the Motion for Order Authorizing Sale of Hickory Corners filed on February 8, 2019 (the “Hickory

Corners Sale Motion”) and in response to the Objection filed by Hagshama on February 29, 2019 (the “Hagshama Objection”).

Certification Pursuant to C.R.C.P. Rule 121, § 1-15(8):

Undersigned counsel for the Receiver certifies she has conferred with counsel for the objectors, Hagshama Hickory NC, LLC and CoFund 6, LLC (collectively “Hagshama”), who consents to the extension.

Motion

1. This Court’s August 30, 2018, Stipulated Order Appointing Receiver (“Receivership Order”) grants the Receiver the authority to sell or otherwise dispose of Estate property and obtain Court approval of any sale for greater than \$10,000.00. Receivership Order ¶ 13(t), at p. 12.

2. Pursuant to paragraph 10 of the Receivership Order, Court approval of any motion filed by the Receiver shall be given as a matter of course within 10 days after the motion is filed and served. Receivership Order, ¶ 10.

3. On February 8, 2019, the Receiver filed a Motion for Order Authorizing the Sale of Hickory Corners, seeking approval of a proposed sale of the Hickory Corners Property in Hickory, North Carolina to Nova Capital Partners, LLC for \$13.6 million pursuant to the Purchase and Sale Agreement submitted with the Motion.

4. Thereafter, on February 19, 2019, Hagshama filed its objection to the Motion, opposing the proposed sale of the Property to Nova.

5. The Receiver's reply in further support of the Hickory Corners Sale Motion and in response to the Hagshama Objection is thus due February 26, 2019.

6. The Receiver requests and Hagshama has agreed to a seven-day extension through March 4, 2019 to file its reply. Good cause exists for the extension. Since the Receiver filed the Hickory Corners Sale Motion and Hagshama, its Objection, several events have recently transpired that may impact the foregoing.

7. The requested extension will not prejudice the Parties in interest or proceedings in this case. This is the Receiver's first request for an extension of time to file a Reply to the Hickory Corners Sale Motion.

WHEREFORE, the Receiver asks the Court to enter an Order granting him a seven (7) day extension of time within which to file its Reply in further support of its Motion for Order Authorizing Sale of Hickory Corners and in response to the Hagshama Objection, up to and including March 4, 2019.

Dated: February 26, 2019.

ALLEN VELLONE WOLF HELFRICH & FACTOR
P.C.



By: s/ Rachel A. Sternlieb

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ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on the February 26, 2019, a true and correct copy of **Receiver's Unopposed Motion for Extension of Time to File Reply in Support of Motion for Order Authorizing Sale of Hickory Corners** was filed and served via the Colorado Courts E-Filing system to the following:

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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.

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	
Plaintiff: Chris Myklebust, Securities Commissioner for the State of Colorado v. Defendants: Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC	▲ COURT USE ONLY ▲
	Case Number: 2018CV33011 Division/Courtroom: 424
PROPOSED ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR ORDER AUTHORIZING SALE OF HICKORY CORNERS	

THIS MATTER is before the Court on the Unopposed Motion for Extension of Time to file Reply in Support of Motion for Order Authorizing Sale of Hickory Corners (the “Motion”), filed by Harvey Sender, the duly-appointed receiver (“Receiver”) in this case. The Court has reviewed the Motion and the file and is otherwise advised

The Motion is hereby GRANTED, and

THE COURT HEREBY ORDERS that the Receiver shall be given a seven (7) day extension of time within which to file a reply in support of its Motion and in response to Hagshama’s objection to the Motion, up to and including March 4, 2019.

SO ORDERED, this ____ day of February, 2019.

BY THE COURT:

Hon. District Court Judge