

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	
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 No.: (303) 534-4499 E-mail: pvellone@allen-vellone.com E-mail: mgilbert@allen-vellone.com E-mail: rsternlieb@allen-vellone.com	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> Case Number: 2018CV33011 Division/Courtroom: 424
<p style="text-align: center;">RECEIVER'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN 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 that the Court grant him until March 12, 2019, to submit a reply in support of his Motion

for Order Authorizing Sale of Hickory Corners (the “Hickory Corners Sale Motion”; filed February 8, 2019) and in reply to the Objection filed by Hagshama on February 19, 2019 (the “Hagshama Objection”).

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

Counsel for the Receiver conferred with counsel for objectors Hagshama Hickory NC, LLC and CoFund 6, LLC (jointly, “Hagshama”), who consents to the requested extension.

Motion

1. On February 8, 2019, the Receiver filed the Hickory Corners Sale Motion seeking approval of a contract to sell the Hickory Corners Property in Hickory, North Carolina to Nova Capital Partners, LLC for \$13.6 million.

2. On February 19, 2019, Hagshama objected to the Motion.

3. The Receiver’s reply to Hagshama’s objection was originally due February 26, 2019, and on that day the Receiver filed an unopposed motion to extend the reply date by a week to March 5, 2019. That Motion inadvertently calculated the reply date as March 4th instead of March 5th, and the Court so ordered.

4. The Receiver hereby requests an additional seven days from March 5, 2019, until March 12, 2019, to file his reply. Good cause exists for the additional extension. The issues raised in Hagshama’s objection and to be addressed in the Receiver’s reply are complex and will have far-reaching implications for the further administration of the Estate. And since the Receiver filed the Sale Motion

and Hagshama its Objection, events have transpired that affect the substance of the reply, including the Receiver's entry into an agreement with Hagshama to sell the Estate's interest in the Hickory Corners property to Odyssey Acquisitions III, LLC and Odyssey's subsequent termination of that agreement.

5. The requested extension will not prejudice any party in interest or unnecessarily delay proceedings in this case.

WHEREFORE, the Receiver asks the Court to enter an Order granting him until March 12, 2019, to submit his Reply in support of the Hickory Corners Sale Motion.

Dated: March 1, 2019.

ALLEN VELLONE WOLF HELFRICH & FACTOR
P.C.

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ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on the March 1, 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.