

<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>Defendant: Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC</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 style="text-align: center;">▲ COURT USE ONLY ▲</p> <p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p>WITHDRAWAL OF RECEIVER’S MOTION FOR ORDER AUTHORIZING SALE OF CASSINELLI SQUARE</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 withdraws his

Motion for Order Authorizing Sale of Cassinelli Square (“Cassinelli Sale Motion”; filed February 21, 2019).

1. As set forth in the Cassinelli Sale Motion, on or about February 13, 2019, the Receiver entered into a contract to sell the Cassinelli Square retail shopping center located in Cincinnati, Ohio to Daniel Johnson for \$2.87 million. The proposed sale would have generated net sales proceeds of approximately \$1.85 million.

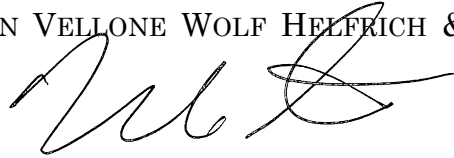
2. On March 1, 2019, Hagshama objected to the Cassinelli Sale Motion. As discussed in the Sale Motion, the contract to sell Cassinelli Square was subject to a “Master Agreement” with Hagshama and Odyssey Acquisitions III, LLC under which Odyssey agreed to purchase the Estate’s interest in Cassinelli Square. Pursuant to the Master Agreement, after the Receiver had entered into the Cassinelli contract with Mr. Johnson, Odyssey confirmed it intended to buy the Estate’s interest in Cassinelli Square.

3. Due to the competing Odyssey Master Agreement, Mr. Johnson terminated his agreement to buy Cassinelli Square. Then on February 25th, Odyssey terminated the Master Agreement. As a result, the Estate has lost both the opportunity to sell Cassinelli Square to Mr. Johnson, and to sell the Estate’s interest in the property to Odyssey. This underscores the Receiver’s request in his March 8, 2019, Reply in Support of Hickory Corners Sale Motion that the Court enter an order authorizing the Receiver to sell the Hagshama Project properties in order to return some economic benefit to the Estate and its creditors.

WHEREFORE, the Receiver withdraws his Cassinelli Sale Motion.

Dated: March 8, 2019.

ALLEN VELLONE WOLF HELFRICH & FACTOR
P.C.



By: /s/ Michael T. Gilbert

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ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I certify that on March 8, 2019, I served a true and correct copy of the foregoing **WITHDRAWAL OF RECEIVER’S MOTION FOR ORDER AUTHORIZING SALE OF CASSINELLI SQUARE** via CCE and/or electronic mail 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 <i>Counsel for Chris Myklebust, Securities Commissioner</i>	Jeffery A. Springer, Esq. Springer and Steinberg P.C. 1600 Broadway, Suite 1200 Denver, Colorado 80202 <i>Counsel for Defendants, Gary Dragul, GDA Real Estate Services, LLC and GDA Real Estate Management, LLC</i>
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In accordance with this Court’s February 1, 2019 Order clarifying notice procedures for this case, I also certify that a copy of the foregoing is being served by electronic mail on all currently known creditors of the Receivership Estate to the addresses set forth on the service list maintained in the Receiver’s records.

By: /s/ Victoria Ray _____
Allen Vellone Wolf Helfrich & Factor P.C.