

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</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>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>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p style="text-align: center;">RECEIVER’S CORRECTION OF PARAGRAPH 13 OF MOTION TO APPROVE SETTLEMENT AGREEMENT WITH GREELEY ASSET FUNDING, LLC (HAPPY CANYON SHOPPES)</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, submits this correction to paragraph 13 of the Receiver’s Motion to

Approve Settlement Agreement with Greeley Asset Funding, LLC (Happy Canyon Shoppes) (“Greeley Motion,” filed March 15, 2019).

Paragraph 13 of the Greeley Motion incorrectly stated that once BPI purchased Ardent’s Box loan, it would release its deed of trusts on the Happy Canyon Shoppes and the Happy Canyon Box. Instead, Ardent will release its deed of trust on the Shoppes and transfer its deed of trust on the Box to BPI in exchange for BPI’s payment of \$5 million. As stated, the Greeley Agreement will nevertheless allow the Estate to transfer marketable title to the Shoppes to BPI and to consummate the pending sale of the Shoppes.

Dated: March 18, 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 certify that on March 18, 2019, a true and correct copy of **RECEIVER'S CORRECTION OF PARAGRAPH 13 OF MOTION TO APPROVE SETTLEMENT AGREEMENT WITH GREELEY ASSET FUNDING, LLC (HAPPY CANYON SHOPPES)** was filed and served via the Colorado Courts E-Filing system on the following:

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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.