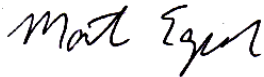


DISTRICT COURT, DENVER COUNTY, COLORADO	
Court Address: 1437 Bannock Street, Rm 256, Denver, CO, 80202	
Plaintiff(s) GERALD ROME SECURITIES COM FOR THE ST OF et al. v. Defendant(s) GARY DRAGUL et al.	DATE FILED: July 3, 2019 3:20 PM CASE NUMBER: 2018CV33011 <p style="text-align: center;">△ COURT USE ONLY △</p> Case Number: 2018CV33011 Division: 424 Courtroom:
Order: Receiver's Application for Letters Rogatory and Commission to Require the Production of Documents w/attach	

The motion/proposed order attached hereto: SO ORDERED.

Issue Date: 7/3/2019



MARTIN FOSTER EGELHOFF
District Court Judge

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 720.865.8612</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:</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 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>RECEIVER’S APPLICATION FOR LETTERS ROGATORY AND COMMISSION TO REQUIRE THE PRODUCTION OF DOCUMENTS</p>	

Pursuant to C.R.C.P. 28(c), Harvey Sender, the duly-appointed receiver (the “Receiver”) for Gary Dragul, GDA Real Estate Services, LLC, GDA Real Estate Management, LLC, and related entities (collectively, “Dragul and the GDA Entities”), by and through undersigned counsel, respectfully applies for issuance by this Court of (i) Letters Rogatory to the appropriate Florida authority requesting that it issue or authorize issuance of a Subpoena to compel the production of documents by a witness in this action and (ii) a Commission to an appropriate Florida authority to require

the witness to produce documents under the Colorado Rules of Civil Procedure. In support of this Application, Plaintiff states as follows:

1. The above-captioned case was filed in the state of Colorado in the Denver County District Court on August 15, 2018.

2. Based upon review of documents gathered in this matter to date, the Receiver believes third party JPMorgan Chase Bank, N.A. ("JP Morgan Chase") may have in their possession discoverable information, documents and information relevant to the claims at issue in this case and bearing upon the Receivership Estate.

3. Upon information and belief, JPMorgan Chase's Registered Agent is CT Corporation System, 1200 S Pine Island Road, Plantation, Florida 33324, in Broward County.

4. Despite undersigned's request, general counsel for JP Morgan Chase refused to accept service of the Subpoena on behalf of his client.

5. Accordingly, the Receiver hereby seeks from the Court, issuance of Letters Rogatory to the Broward County Court in Florida requesting that it issue the Subpoena for the Production of Documents to JPMorgan Chase, together with a commission authorizing appropriate Florida authority to require JPMorgan Chase to produce the requested documents.

6. Attached as **Exhibit A** is the Receiver's Subpoena for the Production of Documents to be served on JP Morgan Chase.

7. Submitted herewith is a proposed form of the Letters Rogatory and Commission that the Receiver asks this Court to issue to the above-noted Florida authority.

WHEREFORE, for the reasons stated herein, Harvey Sender, the duly-appointed Receiver, respectfully requests issuance of Letters Rogatory and a Commission in the form proposed and filed herewith, directing the appropriate Florida authority to issue the Subpoena attached as Exhibit A, requiring JP Morgan Chase to produce the documents sought therein, and for such other relief as this Court deems appropriate.

Dated this 2nd day of July, 2019.

Respectfully submitted,

Rachel A. Sternlieb

By: s/ Rachel A. Sternlieb

Patrick D. Vellone

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ATTORNEYS FOR THE RECEIVER

Attachment to Order - CV 333011

CERTIFICATE OF SERVICE

I certify that on the 2nd day of July 2019, a true and correct copy of the foregoing was filed and served via CCE to the following:

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Morgan Chase Bank, N.A.***

s/ Salowa Khan

Allen Vellone Wolf Helfrich & Factor P.C