

DATE FILED: July 9, 2019

CASE NUMBER: 2018CV33011

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DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 720.865.8612	
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) LETTERS ROGATORY AND COMMISSION TO REQUIRE THE PRODUCTION OF DOCUMENTS	

THE PEOPLE OF THE STATE OF COLORADO

To the Broward County Court, Florida:

1. Whereas it appears to the Denver County District Court, State of Colorado, pursuant to Receiver, Harvey Sender's, Application for Letters Rogatory and Commission to Require the Production of Records, that JPMorgan Chase Bank, N.A. may be able to provide documents relevant to this action, and that the production of documents may be enforced in the State of Florida, this Court respectfully requests that the appropriate authority with jurisdiction in Broward County, Florida issue a Subpoena for the Production of Documents or authorize the issuance of a Subpoena for the Production of Documents compelling JPMorgan Chase Bank, N.A. to produce documents as requested. JPMorgan Chase Bank Registered Agent is CT Corporation System, 1200 S Pine Island Road, Plantation, FL 33324.

In addition, this Court appoints an appropriate Florida authority in Broward County as commissioners for requiring and enforcing the production of requested documents. The authority, or any person associated with it, is authorized to require the production of documents in the manner provided in Rules 28, 34, and 45 of the Colorado Rules of Civil Procedure. The production of documents shall take place at **Stichter, Riedel, Blain & Postler, P.A. for the attention of Barbara A. Hart, 110 East Madison Street, Suite 200, Tampa, FL 33602**, or if by electronic mail to **rsternlieb@allen-vellone.com**, or if by mail to **Allen Vellone Wolf Helfrich & Factor, P.C., 1600 Stout Street, Suite 1100, Denver, CO 80202**, or such location as is mutually agreeable to the parties.

Counsel for the Receiver is authorized to proceed in accordance with Colorado law to issue or obtain and cause service of subpoenas to compel the cooperation and production of documents by the witness, and to submit a copy of these Letters Rogatory and Commission to the appropriate court or official in the State of Florida as evidence of this Court's request that the Florida Court or official issue all necessary process to compel the witness to produce documents.

Dated this 9th day of July, 2019.

By:


Clerk of the Denver County District

