

DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	DATE FILED: July 29, 2019 5:43 PM FILING ID: D1BF6B2D41C98 CASE NUMBER: 2018CV33011
<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 style="text-align: center;">▲ COURT USE ONLY ▲</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 No.: (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com rsternlieb@allen-vellone.com	Case Number: 2018CV33011 Division/Courtroom: 424
RECEIVER'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO WBF/CT ASSOCIATES, LLC'S MOTION FOR LEAVE TO FILE SUIT TO ESTABLISH VALIDITY OF NORTH CAROLINA LIEN	

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 asks the Court to grant him a seven-day extension to reply to WBF/CT Associates, LLC’s (“WBF”)

Motion for Leave to File Suit to Establish Validity of North Carolina Lien (“WBF Motion,” filed July 1, 2019).

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

Counsel for the Receiver conferred with counsel for WBF about the requested extension, who advised that the requested relief is unopposed.

Motion

1. On July 1, 2019, WBF filed its Motion for Leave to File Suit to Establish Validity of North Carolina Lien, seeking court authority to file a suit in North Carolina to determine the validity of WBF’s purported lien on Receivership property known as the Hickory Corners Box located in Hickory, North Carolina.

2. The Receiver’s response was originally due on July 22, 2019, but sought and obtained a 7-day extension of time to file a response to WBF’s Motion, making it due on July 29, 2019.

3. The Receiver and WBF are presently finalizing the details of a stipulation that would moot WBF’s Motion for Leave. As such, the Receiver seeks another 7-day extension of time to respond to allow the parties additional time to work towards a resolution.

4. The Receiver asks the Court to grant him a seven-day extension, until August 5, 2019, to file his response. Good cause exists for the extension and it is not sought for an improper purpose.

5. The requested extension will not prejudice parties in interest or unnecessarily delay proceedings in this case. This is the Receiver's second request for an extension to file a response to WBF's Motion.

WHEREFORE, the Receiver asks the Court to enter an Order granting him a seven-day extension of time, up to and including August 5, 2019, to reply to WBF's Motion.

Dated: July 29, 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 the July 29, 2019, a true and correct copy of the **RECEIVER'S SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO WBF/CT ASSOCIATES, LLC'S MOTION FOR LEAVE TO FILE SUIT ESTABLISHING VALIDITY OF NORTH CAROLINA LIEN** was filed and served via the Colorado Courts E-Filing system to the following:

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