

GRANTED BY COURT

08/16/2019

DATE FILED: August 16, 2019 11:57 AM

CASE NUMBER: 2018CV33011



**Martin Egelhoff
Judge**

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 ▲

Attorneys for Receiver:

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Case No: 2018CV33011

Division/Courtroom: 424

**RECEIVER'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
FILE REPLY IN SUPPORT OF MOTION FOR ORDER AUTHORIZING
SALE OF ASH & BELLAIRE PROPERTIES**

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 requests an extension of time, through and including August 30, 2019, within which to file a reply in support of Receiver’s motion for an order approving the Receiver’s agreement to sell the properties located at 2166, 2176, 2186, and 2196 South Ash Street, and 2175 and 2195 South Bellaire Street, Denver, Colorado 80222.

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

Counsel for the Receiver has conferred with counsel for WBF/CT Associates, LLC (“WBF/CT”), counsel for Victoria Capital Trust and Patch of Land Lending (“Secured Creditors”), and counsel for Galloway & Company, Inc. (“Galloway”) (“WBF/CT”, “Secured Creditors”, and “Galloway” collectively “Objectors”), who do not oppose this extension.

Motion

1. The Receiver filed a Motion for Order Authorizing Sale of Ash & Bellaire Properties (the “Motion”) on July 31, 2019.
2. Secured Creditors filed a limited objection to the Motion on August 9, 2019.
3. Receiver’s reply to Secured Creditors’ objection is presently due on or before August 16, 2019.
4. WBF/CT filed a limited objection to the Motion on August 12, 2019.
5. The Receiver’s reply to WBF/CT’s objection is presently due on or before August 19, 2019.

6. The Receiver intends to file one reply addressing both Secured Creditors' and WBF/CT's objections.

7. Galloway filed a response to the Motion on August 14, 2019.

8. The Receiver's reply to Galloway's response is presently due on or before August 28, 2019.

9. Due to the press of business, counsel for the Receiver is unable to file a reply in support of the Motion by the current deadlines.

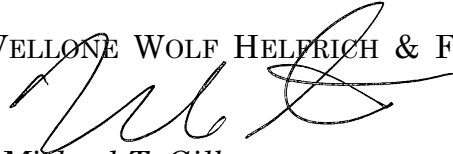
10. As such, the Receiver respectfully requests an extension of time through and including August 30, 2019, within which to file a consolidated reply.

11. The requested extension will not prejudice any parties in interest or proceedings in this case given that the extension is unopposed.

WHEREFORE, the Receiver asks the Court to enter an Order granting him an extension of time through and including August 30, 2019, within which to file a consolidated reply in support of the Motion.

Dated: August 15, 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 hereby certify that on August 15, 2019, I served a true and correct copy of the foregoing **RECEIVER'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR ORDER AUTHORIZING SALE OF ASH & BELLAIRE PROPERTIES** via CCE to the following:

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s/Lisa A. Vos

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