

DISTRICT COURT, COUNTY OF DENVER STATE OF COLORADO 1437 Bannock Street, Room 256 Denver, Colorado 80202 Phone Number: 720.865.7800	DATE FILED: January 13, 2020 9:40 AM FILING ID: 83C9C838D6B7F CASE NUMBER: 2018CV33011
<p>DAVID S. CHEVAL, Acting Securities Commissioner for the State of Colorado,</p> <p>Plaintiff,</p> <p>v.</p> <p>GARY DRAGUL, GDA REAL ESTATE SERVICES, LLC, and GDA REAL ESTATE MANAGEMENT, LLC,</p> <p>Defendants.</p>	<p style="text-align: center;">Δ COURT USE ONLY Δ</p>
SPRINGER AND STEINBERG, P.C. Jeffrey A. Springer, Esq. (Bar No. 6793) 1600 Broadway, Suite 1200 Denver, Colorado 80202 Tel: 303.861.2800 Fax: 303.832.7116 Email: jspringer@springersteinberg.com ATTORNEYS FOR DEFENDANTS	Case Number: 2018CV33011 Courtroom: 424
MOTION TO WITHDRAW AS COUNSEL OF RECORD	

The law firm of Springer and Steinberg, P.C. hereby respectfully moves this Honorable Court for an order permitting its withdrawal from representation of Defendants Gary Dragul, GDA Real Estate Services, LLC and GDA Real Estate Management, LLC, in this case.

AS GROUNDS, the law firm of Springer and Steinberg, P.C. states as follows:

Certificate of Compliance: The undersigned hereby certifies that on January 9, 2020, he conferred with Counsel for Plaintiff who advised that Plaintiff does not take any position regarding the relief requested herein. On January 9, 2020, undersigned counsel also conferred with Counsel for the Receiver who advised that the Receiver had no objection if the Receiver

was provided with an address and email address. Undersigned counsel was not able to provide a physical address.

1. An irreconcilable conflict of interest has arisen between Springer & Steinberg, P.C. and Defendants which necessitates the immediate withdrawal of undersigned counsel in this case.

2. This court retains jurisdiction over this action.

3. Defendants have been properly notified of Springer and Steinberg, P.C.'s intent to withdraw from this matter by telephone. Further, this motion to withdraw will be sent to Defendants via email.

4. The last known address and telephone number of Defendants are:

GDA Real Estate Services, LLC
c/o Gary Dragul

GDA Real Estate Management, LLC
c/o Gary Dragul

Gary Dragul

Current Address Unknown

Undersigned Counsel was unable to obtain this information despite repeated requests

Telephone: (303) 888-9900

Email: garyjdragul@gmail.com

5. Defendants have the burden of keeping the court and other parties informed where notices, pleadings or other papers may be served.

6. Defendants have the obligation to prepare for any court appearance or hire other counsel to prepare for any other proceedings should they occur.

7. There are no hearings scheduled in this matter currently. Pursuant to the Court's October 15, 2019 Order, an additional Status Report is due to be filed with the Court on February 12, 2020.

8. If Defendants fail or refuse to comply with all court rules and orders, they may suffer possible dismissal, default or other sanctions.

9. Defendants and other parties may object to this motion within 14 days of service of this motion to withdraw.

WHEREFORE, the law firm of Springer and Steinberg, P.C. respectfully requests this Honorable Court to grant this Motion to Withdraw allowing its withdrawal of representation of Defendants in this action.

Respectfully submitted this 13th day of January, 2020,

SPRINGER AND STEINBERG, P.C.

By: /s/ Jeffrey A. Springer
Jeffrey A. Springer, #6793
ATTORNEYS FOR DEFENDANTS
*Original signature on file at the
Springer and Steinberg, P.C.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this 13th day of January, 2020, the above and foregoing **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was filed with the Court and a true and accurate copy of the same was served via ICCES to:

Robert Finke
Sueanna Johnson
Matthew Bouillon Mascarenas
Assistant Attorney Generals
1300 Broadway, 8th Floor
Denver, Colorado 80203

Patrick D. Vellone
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Morgan L. Swing
Duane Morris, LLO
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Miami, Florida 33131-2318

VIA EMAIL TO:

GDA Real Estate Services, LLC
c/o Gary Dragul

GDA Real Estate Management, LLC
c/o Gary Dragul

Gary Dragul
Current Address Unknown
Undersigned Counsel was unable to obtain this information despite repeated requests
Telephone: (303) 888-9900
Email: garyjdragul@gmail.com

/s/ Michaela Lloyd
Michaela Lloyd
*Original signature on file at the
Springer and Steinberg, P.C.*