

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: January 27, 2020 2:56 PM FILING ID: FE1E06306FF9F CASE NUMBER: 2019CV33374</p>
<p>Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC</p> <p><i>Plaintiff;</i></p> <p>v.</p> <p>Russell Becker, Joseph J. Peirce, and Ken Stoltzfus</p> <p><i>Defendants.</i></p>	<p>σCOURT USE ONLY σ</p> <hr/> <p>Case Number 2019CV33374</p>
<p>Attorneys for Receiver:</p> <p>Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Rachel A. Sternlieb, #51404 Jeremy T. Jonsen, #48859 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout St., Suite 1100 Denver, Colorado 80202 Phone Number: (303) 534-4499 mgilbert@allen-vellone.com pvellone@allen-vellone.com jjonsen@allen-vellone.com rsternlieb@allen-vellone.com</p>	<p>Div./Ctrm.</p>
<p>NOTICE OF DISMISSAL OF CLAIMS AGAINST JOSEPH J. PEIRCE WITH PREJUDICE</p>	

The Plaintiff, Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC and GDA Real Estate Management, LLC (“Plaintiff”), by and through his counsel, Allen Vellone Wolf Helfrich & Factor P.C., hereby submits this Notice of

Dismissal of Claims Against Joseph J. Peirce With Prejudice and in support thereof, states as follows:

1. Plaintiff commenced this action against Joseph J. Peirce (“Peirce”), among others, on August 30, 2019, asserting claims for turnover, actual fraud pursuant to C.R.S. § 38-8-105(1)(a), constructive fraud pursuant to C.R.S. § 38-8-105(1)(b), and unjust enrichment.

2. On December 9, 2019, Peirce waived service of the Complaint against him.

3. Peirce has not filed an answer or otherwise responded to the Complaint.

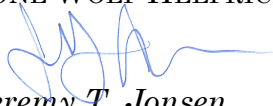
4. Plaintiff and Peirce have agreed to settle all claims between them.

5. Accordingly, Plaintiff hereby provides notice under C.R.C.P. 41(a)(1) that he voluntarily dismisses all claims asserted against Peirce in the above captioned case, with prejudice.

WHEREFORE, Plaintiff voluntarily dismisses all claims asserted against Peirce in this litigation with prejudice pursuant to C.R.C.P. 41(a)(1).

Respectfully submitted this 27th day of January, 2020.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

By:  /s/ *Jeremy T. Jonsen*

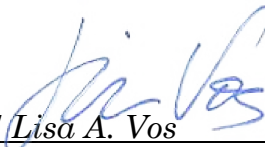
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ATTORNEYS FOR THE PLAINTIFF, AS RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2020, I served a true and correct copy of the foregoing on the Colorado Courts E-Filing system to all parties who have entered an appearance in this case and also emailed and mailed the foregoing via certified mail to Joseph J. Peirce, at the address listed below.

Joseph J. Peirce
13715 N.W. 11th Street
Pembroke Pines, FL 33028
joepeirce2125@gmail.com



s/ Lisa A. Vos

Allen Vellone Wolf Helfrich & Factor P.C.