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CASE NUMBER: 2020CV30255

DISTRICT COURT, DENVER COUNTY
STATE OF COLORADO
Denver District Court
1437 Bannock St.
Denver, CO 80202

Plaintiff: HARVEY SENDER, AS RECEIVER
FOR GARY DRAGUL; GDA REAL ESTATE
SERVICES, LLC; AND GDA REAL ESTATE
MANAGEMENT, LLC

v.

Defendants: GARY J. DRAGUL, an individual;
BENJAMIN KAHN, an individual; THE
CONUNDRUM GROUP, LLP, a Colorado
Limited Liability Company; SUSAN
MARKUSCH, an individual; ALAN C. FOX, an
individual; ACF PROPERTY MANAGEMENT,
INC.; a California Corporation, MARLIN S.
HERSHEY, an individual; and PERFORMANCE
HOLDINGS, INC., a Florida Corporation; JOHN
AND JANE DOES 1 – 10; and XYZ
CORPORATIONS 1 – 10.

Attorney for Defendant Susan Markusch:

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**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant Susan Markusch (“Defendant”), by and through her undersigned counsel, hereby moves the Court for an Order extending the time within which Defendant may answer or otherwise respond to the Plaintiff’s Amended Complaint (the “Complaint”). As grounds for the requested relief, Defendant states as follows:

1. Defendant is authorized to state that Plaintiff does not oppose the relief requested in this Motion.
2. Plaintiff commenced this action by filing its Complaint on or about January 21, 2020.
3. Defendant has just engaged undersigned counsel to represent her in this action.
4. Plaintiff has agreed to extend the time for responses to the Complaint in favor of other parties, to and including March 17, 2020.
5. Undersigned counsel has been informed that, unless extended by this Court, the time for filing of Defendant's answer or other would be due on or about February 25, 2020.
6. Defendant believes she has a meritorious defenses to Plaintiff's Complaint.
7. For the above reasons, Defendant requests an extension of time within which she may respond to Plaintiff's Complaint to and including March 17, 2020.
8. Granting the short extension of time requested herein will serve the interests of justice by permitting the Defendant to plead her defenses.

WHEREFORE, Defendant Susan Markusch requests the Court to extend the time within which Defendant may answer or otherwise respond to Plaintiffs' Complaint to and including March 17, 2020. .

Date: February 25, 2020

THOMAS F. QUINN, P.C.

Original signed copy of this pleading on file at the offices of Thomas F. Quinn, P. C.

/s/ Thomas F. Quinn

By: _____
Thomas F. Quinn, Esq., Reg No. 5887
Attorney for Defendant Susan Markusch

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2020 a true and correct copy of the foregoing pleading was provided to ICCES, with copies to be furnished, via ICCES to the following:

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/s/ Thomas F. Quinn

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