

C.R.C.P. 205.3, for *pro hac vice* admission to practice before this Court in the above-captioned action. As grounds therefor, Movant states the following:

C.R.C.P. 121 § 1-15, ¶ 8 CERTIFICATE OF CONFERRAL

The undersigned certifies that he has in good faith conferred with the Receiver's counsel, Plaintiff David S. Cheval's counsel, and Defendant Gary J. Dragul's counsel about this motion and, based thereon, advises the Court that these parties do not oppose Movant's requested *pro hac vice* admission.

1. C.R.C.P. 205.3 provides that an attorney and counselor at law in good standing from any other jurisdiction in the United States may, in the discretion of a Colorado court of record, be permitted to participate before the Court in a trial, argument, and other proceeding in the particular case in which the attorney is employed, provided that a member in good standing of the Bar of the State of Colorado is associated in such case at all stages of the case.

2. Movant is a member in good standing of the Bar of the State of California and has been assigned California bar admission number 212862. Movant has also been admitted in the following jurisdictions: Ninth Circuit Court of Appeals (admitted March 2007) and U.S. District Court for the Central District of California (admitted June 2004).

3. Movant has previously sought and been granted *pro hac vice* admission on a single prior occasion in a Colorado court. That previous *pro hac vice* admission was granted on February 28, 2020, in the related civil action captioned *Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC v. Gary J. Dragul, et. al*, Denver District Court case number 2020CV30255 (Honorable Robert Lewis McGahey, Jr., presiding). Movant's two clients in that related action are the same two clients she seeks *pro hac*

vice admission to represent in this action—ACF Property Management, Inc., and Alan C. Fox. Likewise, Movant's Sponsoring/Associate Attorney in that action is the same Colorado attorney sponsoring her *pro hac vice* admission in this action—Lucas T. Ritchie of Moye White, LLP.

4. Movant is in good standing in all Bars wherever admitted and has not been subject to any order of discipline or disability by any Bar, or had any request for *pro hac vice* admission denied or revoked.

5. Movant represents ACF Property Management, Inc. and Alan C. Fox and hereby verifies that she has notified ACF Property Management, Inc. and Alan C. Fox of this verified motion.

6. Movant hereby acknowledges that she is subject to the Colorado Rules of Professional Conduct, the Colorado Rules of Civil Procedure, and other Court rules, and that she will follow such rules throughout the *pro hac vice* admission, and that this verified motion complies with such rules.

7. Sponsoring/Associate Attorneys Lucas T. Ritchie, Eric B. Liebman, and Joyce C. Williams of Moye White LLP, Denver, Colorado, 80202, are all members in good standing of the Bar of the State of Colorado. Mr. Ritchie, Mr. Liebman, and/or Ms. Williams will be present and participate in a meaningful and substantial manner throughout all proceedings and the trial of this action.

8. Movant has filed a copy of this verified motion with the Clerk of the Colorado Supreme Court at the Office of Attorney Registration, 1300 Broadway, Suite 510, Denver, Colorado 80203 and paid the requisite fee.

9. Movant hereby certifies that she will serve a copy of this verified motion upon all counsel of record and on ACF Property Management, Inc. and Alan C. Fox.


10. By execution of the attached verification, the Sponsoring/Associate Attorney verifies his association on this matter.

WHEREFORE, Movant respectfully requests that the Court admit Sharon Ben-Shahar Mayer *pro hac vice*, to practice before the Court in this action.

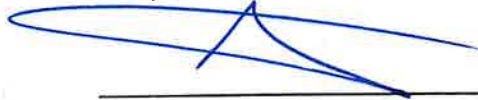
A proposed order granting the requested *pro hac vice* admission is submitted herewith.

DATED: March 23, 2020

Respectfully submitted,



Sharon Ben-Shahar Mayer, California #212862
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*Attorneys for Creditors Alan C. Fox and ACF
Property Management, Inc.:*

VERIFICATION

I, Sharon Ben-Shahar Mayer, being duly sworn upon oath, hereby verify and affirm that I have read all of the statements contained in the foregoing Motion Requesting *Pro Hac Vice* Admission and that said statements are true and correct to the best of my information, knowledge and belief.



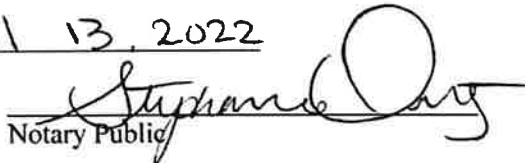
Sharon Ben-Shahar Mayer, California #212862
BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
DROOKS, LINCENBERG & RHOW, P.C.

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

The foregoing Verification was subscribed to and sworn before me this 23 day of March, 2020 by Sharon Ben-Shahar Mayer, who was personally identified to me and known by me to be the person who signed above.

Witness my hand and official seal.

My commission expires April 13, 2022


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on March 27th, 2020 a true and correct copy of the foregoing was electronically filed via CCEF and served on the following:

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s/ Brenda K. Sussman