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| <p>DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 303.606.2433</p> | |
| <p>Plaintiff: David S. Cheval, Acting Securities Commissioner for the State of Colorado</p> <p>v.</p> <p>Defendants: Gary Dragul; GDA Real Estate Services, LLC; and GDA Real Estate Management, LLC</p> | <p>▲ COURT USE ONLY ▲</p> |
| <p>ATTORNEYS FOR RECEIVER HARVEY SENDER</p> <p>Patrick D. Vellone (#15284) Michael T. Gilbert (#15009) Rachel A. Sternlieb (#51404) ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout St., Suite 1900 Denver, Colorado 80202 Tel: (303) 534-4499 E-mail: pvellone@allen-vellone.com E-mail: mgilbert@allen-vellone.com E-mail: rsternlieb@allen-vellone.com</p> | <p>Case No: 2018CV33011</p> <p>Division/Courtroom: 424</p> |
| <p>RECEIVER'S <u>UNOPPOSED</u> MOTION FOR AN EXTENSION OF TIME TO SUBMIT REPLY IN SUPPORT OF HIS MOTION FOR TURNOVER VS. ALAN C. FOX AND ACF PROPERTY MANAGEMENT, INC.</p> | |

Harvey Sender, Receiver, hereby requests an extension of time, through and including May 11, 2020, to submit his reply in support of his Motion for Turnover vs. Alan C. Fox and ACF Property Management, Inc. (“Fox Turnover Motion”).

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

The Receiver's counsel has conferred with counsel for Alan C. Fox and ACF Property Management, Inc. ("Fox") and Fox does not oppose the requested relief.

Motion

1. The Receiver filed the Fox Turnover Motion on March 13, 2020. Fox requested, and the Receiver consented to, an extension of 21-days to respond to the Motion, as Fox indicated due to: "(a) the complexity of the underlying facts and issues raised in the Turnover Motion, all of which must be assessed before responding; and (b) the office closures, business interruptions, and other significant perils attendant to Covid-19's arrival in Colorado and its global pandemic status." Creditors Alan C. Fox and ACF Property Management, Inc.'s *Unopposed* Motion for Enlargement of Time to Respond to Receiver's Motion for Turnover (March 20, 2020). The Court granted Fox's request for an extension on March 23, 2020.

2. On April 13, 2020, Fox filed his response to the Turnover Motion. The body of the Response is 16 pages, attaches an 8-page affidavit and more than 50-pages of exhibits. The Response relies on corporate law from Delaware, Colorado, Washington, Arizona, and Texas.

3. Due to the complexity of the underlying facts and issues raised in the Response, and the office closures, business interruptions, and other significant perils

attendant to Covid-19's arrival in Colorado and its global pandemic status, the Receiver needs additional time to file his reply to Fox's Response.

4. Fox does not oppose the requested extension.

WHEREFORE, the Receiver asks the Court grant him through and including May 11, 2020, to file his reply in support of the Fox Turnover Motion.

Dated: April 17, 2020.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.



/s/ Michael T. Gilbert

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Attorneys for the Receiver

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2020, I served a true and correct copy of the foregoing **RECEIVER'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO SUBMIT REPLY IN SUPPORT OF HIS MOTION FOR TURNOVER VS. ALAN C. FOX AND ACF PROPERTY MANAGEMENT, INC.** via CCE to the following:

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