

DISTRICT COURT, DENVER COUNTY  
STATE OF COLORADO  
1437 Bannock St.  
Denver, CO 80202  
Tel: (303) 606-2300

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;  
OLSON REAL ESTATE SERVICES, LLC, a  
Colorado limited liability company; JUNIPER  
CONSULTING GROUP, LLC, a Colorado limited  
liability company; JOHN AND JANE DOES 1 –  
10; and XYZ CORPORATIONS 1 – 10.

▲ COURT USE ONLY ▲

Case Number:2020CV30255

**Attorney for** Defendants Susan Markusch and  
Olson Real Estate Services, LLC:

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**MOTION FOR LEAVE TO WITHDRAW**

.Thomas F. Quinn, P.C. and Thomas. F. Quinn, Esq . (collectively, the “Firm”) requests  
leave to withdraw as counsel of record for Defendants Defendants Susan Markusch and

Olson Real Estate Services, LLC. (“Defendants”) pursuant to Rule 121, § 1-1 of the Colorado Rules of Civil Procedure. As grounds for this motion, the Firm states as follows:

Regarding Consultation: Undersigned counsel has consulted with Plaintiff’s Counsel of Record and is authorized to state that Plaintiff does not oppose the relief requested in this Motion.

1. As required by C.R.C.P. 12, 1-1(3) the undersigned sent the attached Notice of Intent to Withdraw and this Motion to Defendants Defendants Susan Markusch and Olson Real Estate Services, LLC (the “Clients”) by United States Mail, First Class Postage Prepaid on July 31, 2020, and via email at each of the email addresses provided to the Firm by the Clients for use in communicating with them.
2. Defendant Susan Markcush engaged the Firm to represent her in this case on or about March 23, 2020. Olson Real Estate Services, LLC was added to the engagement when the complaint was amended to include that entity as a party defendant.
3. Differences have arisen between the Firm and the Clients regarding management of the engagement which make it impractical for the Firm to continue to represent the Clients in this matter.

WHEREFORE, the law firm of Thomas F. Quinn, P.C. respectfully requests that this Court enter an order allowing Thomas F. Quinn and the Firm to withdraw as counsel for Defendants Defendants Susan Markusch and Olson Real Estate Services, LLC.

Date: July 31, 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 Defendants Defendants Susan  
Markusch and Olson Real Estate Services,  
LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2020 a true and correct copy of the foregoing pleading was provided to ICCES, with copies to be furnished, via electronic filing or U.S. Mail, to the all counsel of record who have entered their appearance in this case.

/s/ Thomas F.Quinn

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Thomas F.Quinn