

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:**

THOMAS F. QUINN
THOMAS F. QUINN, P.C.
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Atty. Reg. # 5887

NOTICE OF INTENT TO WITHDRAW

To:

Susan Markusch
6321 Sosuth Geneva Circle
Englewood, CO 81201

and Olson Real Estate Services, LLC:
c/o Susan Markusch
6321 Sosuth Geneva Circle
Englewood, CO 81201

This Notice of Intent to Withdraw is being sent to you to inform you of the following:

1. Thomas F. Quinn and the law firm of Thomas F. Quinn, P.C. wish to withdraw as your counsel.
2. The District Court for the County of Denver will retains jurisdiction over you and over this matter.
3. You have the burden of keeping the Court informed where notices, pleadings or other papers may be served.
4. You have the obligation to prepare for trial or obtain alternate counsel to prepare for trial.
5. If you fail or refuse to meet these burdens, the you may suffer possible default.
6. You are subject to an obligation to respond to Plaintiff's First Amended Complaint on or before July 31, 2020. Undersigned counsel will meet that deadline. Contemporaneous with the submission of this Notice, the Firm will seek on Defendants' behalf a stay of other proceedings in this case for a period of thirty (30) days, to permit you to engage substituted counsel. However, there is now no assurance that the requested stay will be granted. The holding of trial and other proceedings in the case will not be affected by the withdrawal of counsel pursuant to this Notice.
7. Service of process may be served upon you at your last known address. The last known address provided to the Court for each of you is set forth above.
8. You have the right to object to the withdrawal of the Firm as your counsel within fifteen (15) days of the date of this Notice.

Dated: 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 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 and indicated attachment was (1) 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.; and (2) deposited in U. S. Mail, first class postage pre-paid, addressed to each of the following persons at their respective addresses set forth below:

Susan Markusch
6321 Sosuth Geneva Circle
Englewood, CO 81201

Olson Real Estate Services, LLC
c/o Susan Markusch
6321 Sosuth Geneva Circle
Englewood, CO 81201

/s/ Thomas F. Quinn

Thomas F. Quinn