

DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	DATE FILED: December 1, 2020 3:36 PM FILING ID: 35CAF2E44DAE4 CASE NUMBER: 2020CV30255
Plaintiff: HARVEY SENDER, AS RECEIVER FOR GARY DRAGUL; GDA REAL ESTATE SERVICES, LLC; AND GDA REAL ESTATE MANAGEMENT, LLC v. Defendants: GARY J. DRAGUL, et al.	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Attorneys for Plaintiff: Patrick D. Vellone, #15284 Matthew M. Wolf, #33198 Rachel A. Sternlieb, #51404 Michael T. Gilbert, #15009 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. 1600 Stout Street, Suite 1900 Denver, Colorado 80202 Phone (303) 534-4499 pvellone@allen-vellone.com mwolf@allen-vellone.com rsternlieb@allen-vellone.com mgilbert@allen-vellone.com	Case No.: 2020CV30255 Division/Courtroom: 414
RECEIVER’S STATUS REPORT RE JUNIPER SETTLEMENT	

Plaintiff, Harvey Sender, solely in his capacity as Receiver for Gary Dragul; GDA Real Estate Services, LLC; and GDA Real Estate Management, LLC, and related entities (the “**Receiver**”), submits this status report concerning the pending settlement with Defendant Juniper Consulting Group, LLC (“Juniper”).

1. As discussed in the Receiver’s Response to Notice of Pending Dismissal (filed and granted by the Court on November 6, 2020), the Receiver and Juniper have reached a settlement that will result in the dismissal of Juniper from this case with

prejudice once approved by the Receivership Court. Although the Receiver anticipated this would occur before December 2, 2020, an unexpected email glitch delayed Juniper's counsel receiving the draft settlement agreement, and the agreement not executed until November 17th. The Receiver filed a motion seeking approval of the agreement with the Receivership Court the following day, November 18th.

2. Pursuant to the Receivership Order in the Receivership Case, objections to motions filed by the Receiver are due within ten days. Objections to the Juniper approval motion were therefore due by November 30, 2020. None has been filed. The Receiver anticipates the Receivership Court will shortly enter an order approving the Juniper settlement.

3. Under the terms of the Juniper settlement, Juniper is to make a settlement payment to the Receiver within 14 days after Receivership Court approval, and thereafter the Receiver has agreed to dismiss his claims in this case against Juniper with prejudice.

4. To allow sufficient time to obtain Receivership Court approval and payment, the Receiver asks the Court to continue to refrain from dismissing his claims against Juniper. The Receiver proposes to either file a notice dismissing his claims against Juniper with prejudice on or before January 8, 2021, or file another status report concerning the status of the settlement approval. Given the status of

pending matters in this case, the Receiver does not believe that any party will be prejudiced by this request.

Dated: December 1, 2020.

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.



By: s/ Michael T. Gilbert

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 1, 2020, a true and correct copy of **RECEIVER'S STATUS REPORT RE JUNIPER SETTLEMENT** was filed and served via the Colorado Courts E-Filing system to the following:

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In accordance with C.R.C.P. 121 § 1-26(7), a printed copy of this document with original signatures is being maintained by the filing party and will be made available for inspection by other parties or the Court upon request.