

<p>DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202</p>	<p>DATE FILED: January 29, 2021 1:42 PM FILING ID: C52FBC98762F6 CASE NUMBER: 2018CV33011</p>
<p>TUNG CHAN, Securities Commissioner for the State of Colorado, Plaintiff, v. GARY DRAGUL, GDA REAL ESTATE SERVICES, LLC, and GDA REAL ESTATE MANAGEMENT, LLC, Defendants.</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Applicant Attorney: Michael C. Van Shumway Van 8985 S Eastern Ave., Suite 100 Las Vegas, Nevada 89123 Phone: 702 478-7770 Email: Michael@shumwayvan.com</p> <p>Sponsoring Attorney, and Attorneys for Defendant Gary J. Dragul Paul L. Vorndran, Atty. Reg. No. 22098 Christopher S. Mills, Atty. Reg. No. 42042 Jones & Keller, P.C. 1675 Broadway, 26th Floor Denver, CO 80202 Phone: 303-573-1600 Email: pvorndran@joneskeller.com cmills@joneskeller.com</p>	<p>Case No. 2018CV33011 Courtroom: 424</p>
<p>AMENDED VERIFIED MOTION OF MICHAEL C. VAN FOR ADMISSION PRO HAC VICE</p>	

Pursuant to C.R.C.P. 121 § 1-2 and C.R.C.P. 205.3, Michael C. Van of Shumway Van, hereby moves for *pro hac vice* admission to appear before this Court in the above-referenced matter. In support of this motion, Mr. Van states as follows:

1. Under C.R.C.P. 205.3, an attorney in good standing from any other jurisdiction in the United States may, at 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 cause at all stages of the case.

2. Mr. Van is a member in good standing of the Bar in the State of Nevada. Mr. Van is assigned attorney registration or bar admission number 3876 in the State of Nevada.

3. Mr. Van has also been licensed in the following jurisdictions with the bar admission numbers:

- a. Arizona, #031969
- b. Texas, #24079761
- c. Washington, #54773
- d. Utah, #4932

Mr. Van is also admitted to practice in the United States District Courts for the states of Utah, Nevada, Texas and the Ninth Circuit Court of Appeals.

4. Mr. Van is in good standing in all of the jurisdictions he currently practices 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. Mr. Van was previously admitted *pro hac vice* in the cases, *Maralax v. Withers, et al.*, Rio Blanco County, District Court, Case No. 2010CV20, and *Re/Max, LLC v. Shelton*, Denver County, District Court, Case No. 10CV5956.

6. Mr. Van acknowledges that he is subject to all applicable provisions of the Colorado Rules of Professional Conduct, the Colorado Rules of Civil Procedure and other court rules, and that he has read such rules and will follow such rules.

7. Paul L. Vorndran, #22098, is a member in good standing of the Bar of the State of Colorado.

8. Mr. Vorndran will be present and participate in a meaningful and substantial manner throughout the proceedings and trial of this matter.

9. The following are parties and interested parties to the proceeding and have been notified of this Verified Motion requesting *pro hac vice* admission:

Attorneys for Receiver

Patrick D. Vellone
Rachel A. Sternlieb
Michael T. Gilbert
Allen Vellone Wolf Helfrich & Factor P.C.
1600 Stout St., Suite 1100
Denver, Colorado 80202

Attorneys for Brownstein Hyatt Farber Schreck, LLP

Richard B. Benenson, #32566
BROWNSTEIN HYATT FARBER SCHRECK, LLP
410 Seventeenth Street, Suite 2200
Denver, CO 80202-4432

Attorneys for Securities Commissioner

Robert W. Finke
Janna K. Fischer
Ralph L. Carr Judicial Building
1300 Broadway, 8th Floor
Denver, Colorado 80203

10. Mr. Van has filed a copy of this 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 required fee.

11. An affidavit setting forth Mr. Van's qualifications and compliance is attached.

12. By execution of the attached verification, the Colorado licensed Sponsoring Attorney verifies his association on this matter.

WHEREFORE, Out of State Counsel respectfully requests that the Court admit Michael C. Van *pro hac vice*, to practice before the Court in this case.

Dated this 29th day of January, 2021.

JONES & KELLER, P.C.

/s/ Paul L. Vorndran

Paul L. Vorndran, #22098

Christopher S. Mills, #42042

*ATTORNEYS FOR DEFENDANT GARY J.
DRAGUL*

and

SHUMWAY VAN

/s/ Michael C. Van

Michael C. Van, #3876

*ATTORNEYS FOR DEFENDANT GARY J.
DRAGUL*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2021, a true and correct copy of the foregoing **AMENDED VERIFIED MOTION OF MICHAEL C. VAN FOR ADMISSION PRO HAC VICE** was filed and served via the Colorado Court E-filing system to the following:

Patrick D. Vellone
Rachel A. Sternlieb
Michael T. Gilbert
Allen Vellone Wolf Helfrich & Factor P.C.
1600 Stout St., Suite 1100
Denver, Colorado 80202

Richard B. Benenson, #32566
BROWNSTEIN HYATT FARBER SCHRECK, LLP
410 Seventeenth Street, Suite 2200
Denver, CO 80202-4432

Robert W. Finke
Janna K. Fischer
Ralph L. Carr Judicial Building
1300 Broadway, 8th Floor
Denver, Colorado 80203

s/ Emily Morse-Lee

Emily Morse-Lee


AFFIDAVIT OF MICHAEL C. VAN FOR ADMISSION PRO HAC VICE

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I, Michael C. Van, hereby swear or affirm that the statements made in the **AMENDED**

VERIFIED MOTION OF MICHAEL C. VAN FOR ADMISSION PRO HAC VICE are true and correct to the best of my knowledge.

Executed this 29th day of January, 2021 in Las Vegas, NV.



Michael C. Van

STATE OF NEVADA)
) SS.
COUNTY OF Clark)

Subscribed and sworn to before me this 29th day of January, 2021, by Michael C. Van.

Witness my hand and official seal.



Notary Public



VERIFICATION OF PAUL L. VORNDRAN

I, Paul L. Vorndran, hereby verify the association of Michael G. Van with Jones & Keller, P.C., in the litigation styled as *Chan v. Dragul, et al.*, Denver County District Court, Case No. 2018CV33011.

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Paul L. Vorndran

STATE OF COLORADO)
) SS.
CITY AND COUNTY OF DENVER)

Subscribed and sworn to before me this 29th day of January, 2021, by Paul L. Vorndran.

Witness my hand and official seal.



Notary Public

