

<p>DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202 303.606.2433</p>	<p>DATE FILED: February 16, 2021 8:49 AM FILING ID: 901EC220A42D4 CASE NUMBER: 2018CV33011</p>
<p>Plaintiff: Tung Chan, 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: 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 Phone Number: (303) 534-4499 pvellone@allen-vellone.com mgilbert@allen-vellone.com rsternlieb@allen-vellone.com</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p align="center">RECEIVER’S WITNESS AND EXHIBIT LIST FOR FEBRUARY 19, 2021 HEARING</p>	

Harvey Sender, the duly-appointed receiver (“Receiver”) for Gary Dragul (“Dragul”), GDA Real Estate Services, LLC, GDA Real Estate Management, LLC, and related entities (collectively, “Dragul and the GDA Entities”), hereby submits thereby submits his witness and exhibits list for the February 19, 2021 hearing on his Motion

for Order Approving Settlement Agreement with Brownstein, Hyatt, Farber & Schreck, LLP (the “Hearing”).

WITNESSES

The Receiver **will call** the following witnesses to testify at the Hearing:

1. **Harvey Sender, Esq.**, c/o Allen Vellone Wolf Helfrich & Factor, P.C.,
1600 Stout St., Suite 1900, Denver, Colorado 80202.

The Receiver **may call** the following witnesses to testify at the Hearing:

1. Any witnesses listed by Gary Dragul or any other participant at the Hearing;
2. Any witness necessary to authenticate any document; and
3. Any witness necessary for impeachment or rebuttal.

EXHIBITS

The Receiver may use any exhibit identified on the Exhibit List attached hereto as **Exhibit A**, incorporated herein by reference.

The Receiver reserves the right to amend his witness and exhibit lists prior to the Hearing.

Dated: February 16, 2021

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

Rachel A. Sternlieb

By: s/ Rachel A. Sternlieb

Patrick D. Vellone

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Attorneys For The Receiver

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of February, 2021, a true and correct copy of **The Receiver's Witness and Exhibit List for February 19, 2021 Hearing** was filed and served via the Colorado Courts E-Filing system to the following:

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Counsel for Defendants, Gary Dragul,

s/ Terri M. Novoa 
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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.

**RECEIVER'S EXHIBIT LIST FOR FEBRUARY 19, 2021, HEARING ON
THE RECEIVER'S MOTION FOR AN ORDER APPROVING SETTLEMENT AGREEMENT
WITH BROWNSTEIN, HYATT, FARBER & SCHRECK LLP**

Case: *Chan v. Dragul, et al.*, 2018CV33011 (Denver District Court)

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Exhibit No.	Date	Description	Witness	Stip.	Offered	Received	Refused	Ruling Reserved
1.	8/30/2018	Receivership Order						
2.	8/15/2018	Commissioner's Complaint						
3.	12/09/2020	Order Granting Receiver's Fourth Application for Professional Fees and Expenses						
4.	8/12/2020	Vorndran and Gilbert email chain re conferral about abandonment of Receiver's claims against professionals						
5.	10/01/2020	Order denying Dragul's First Motion to Order Claims Abandoned						
6.	10/07/2020	Complaint in <i>Dragul, et al v. Brownstein, Hyatt Farber & Schreck, LLP, et al.</i> Case No. A-20-822625-C (8 th Judicial Dist. Court, Clark County, NV)						
7.	11/13/2020	Settlement Agreement between Brownstein Hyatt Farber & Schreck LLP and the Receiver						
8.	5/11/2020	Receiver's Fourth Report						
9.	11/23/2020	Dragul's Objection to the Receiver's Motion to Approve Settlement Agreement with Brownstein Hyatt Farber & Schreck, LLP						

RECEIVER'S EXHIBIT LIST FOR OCTOBER 25, 2019, HEARING ON TURNOVER MOTION

Case: *Cheval v. Dragul, et al.*, 2018 CV 33011

Exhibit No.	Date	Description	Witness	Stip.	Offered	Received	Refused	Ruling Reserved
10.	11/30/2020	Receiver's Reply in Support of Motion to Approve Settlement Agreement with Brownstein Hyatt Farber & Schreck LLP						
11.	12/31/2020	Brownstein Hyatt Farber & Schreck LLP's Brief in Support of Receiver's Motion to Approve Settlement Agreement						
12.	2/08/2021	Receivership Estate Account Summary						