DISTRICT COURT, DENVER COUNTY,

COLORADO

1437 Bannock Street DATE FILED: February 18, 2021 10:36 AM FILING ID: 1FBE1DA21E058

Denver, CO 80202 CASE NUMBER: 2018CV33011

**PLAINTIFF:** 

TUNG CHAN, SECURITIES COMMISSIONER FOR THE STATE OF COLORADO

v.

**DEFENDANTS:** 

GARY DRAGUL; GDA REAL ESTATE SERVICES, LLC; AND GDA REAL ESTATE MANAGEMENT,

LLC

▲ COURT USE ONLY ▲

Attorneys for Brownstein Hyatt Farber Schreck.

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BROWNSTEIN HYATT FARBER SCHRECK, LLP'S EXHIBIT LIST FOR FEBRUARY 19, 2021 HEARING

Case Number: 2018CV33011

Div/Ctrm: 424

Brownstein Hyatt Farber Schreck, LLP ("BHFS") hereby submits its exhibit list for the February 19, 2021 hearing on the Receiver's Motion to Approve Settlement

Agreement with Brownstein Hyatt Farber Schreck, LLP. In addition to any exhibit

identified in the exhibit lists of the Receiver and Mr. Dragul, BHFS may use any of

the exhibits identified in the exhibit list attached hereto as Exhibit A.

BHFS reserves the right to amend its exhibit list prior to the hearing.

Dated: February 18, 2021

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: s/Richard B. Benenson

Richard B. Benenson, #32566

PROSKAUER ROSE LLP

By: s/Bart H. Williams

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ATTORNEYS FOR BROWNSTEIN HYATT FARBER SCHRECK, LLP

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 18th day of February, 2021, a true and correct copy of the foregoing BROWNSTEIN HYATT FARBER SCHRECK, LLP'S EXHIBIT LIST FOR FEBRUARY 19, 2021 HEARING was filed with the Court and served via Colorado Courts E-Filing System on all counsel of record.

s/ Penny G. Lalonde

Penny G. Lalonde, Paralegal

## **EXHIBIT A**

## BROWNSTEIN HYATT FARBER SCHRECK, LLP'S EXHIBIT LIST FOR FEBRUARY 19, 2021 HEARING

Chan v. Dragul, Case No. 2018CV33011

Exhibit No.	Date	Description	Witness	Stip.	Offered	Received	Refused	Ruling Reserved
101.	July 3, 1996	Letter from GDA Real Estate Services transmitting executed Fee Agreement for Representation to BHFS						
102.	Jan. 20, 2015	Order approving Stipulation and Proposed Order Regarding Parties' Settlement Agreement in Colo. Dep't of Public Health & Env't v. YM Retail 07 A, LLC, et al., Denver Dist. Ct. Case No. 2013CV33076						
103.	Dec. 5, 2019	Receiver's Motion to Approve Settlement Agreement with Dragul Concerning Turnover Motion with Exhibit						
104.	Feb. 14, 2021	Email from Paul L. Vorndran to undisclosed recipients re "Dragul Receivership"						