

DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202	<p style="text-align: center;">▲ COURT USE ONLY ▲</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>Attorneys for Brownstein Hyatt Farber Schreck, LLP:</p> <p>Richard B. Benenson, #32566 BROWNSTEIN HYATT FARBER SCHRECK, LLP 410 Seventeenth Street, Suite 2200 Denver, CO 80202-4432 Phone: 303.223.1100 Fax: 303.223.1111 Emails: rbenenson@bhfs.com</p> <p>Bart H. Williams, CA 134009, <i>admitted pro hac vice</i> Jennifer L. Roche, CA 254538, <i>admitted pro hac vice</i> Shawn S. Ledingham Jr., CA 275628, <i>admitted pro</i> <i>hac vice</i> PROSKAUER ROSE LLP 2029 Century Park East, 24th Floor Los Angeles, CA 90067 Phone: 310. 557.2900 Emails: bwilliams@proskauer.com; jroche@proskauer.com; sledingham@proskauer.com</p>	<p>Case Number: 2018CV33011</p> <p>Div/Ctrm: 424</p>
<p>BROWNSTEIN HYATT FARBER SCHRECK, LLP'S JOINDER IN RECEIVER'S COMBINED RESPONSE TO CHAD HURST'S (1) EMERGENCY MOTION TO STAY THE COURT'S FEBRUARY 26, 2021, ORDER, AND (2) MOTION TO VACATE THAT ORDER</p>	

Brownstein Hyatt Farber Schreck, LLP joins the combined response filed by the Receiver, Harvey Sender, in opposition to Chad Hurst's Emergency Motion to

Stay the Court's February 26, 2021 Order and Mr. Hurst's Motion to Vacate February 26, 2021 Order.

Brownstein further objects that neither motion was served on counsel for Brownstein. Although the proof of service for the Motion to Stay says that a "Brad Williams" was served via the Colorado Courts E-Filing System as counsel for Brownstein, no such attorney represents Brownstein. Bart Williams is counsel of record for Brownstein in this case and, as a pro hac vice attorney, does not receive service by CCES. Nor was the Motion to Stay served on Brownstein's Colorado counsel in this matter, Richard Benenson, who can receive service by CCES.

Gary Dragul's counsel was informed of these deficiencies in a letter sent on March 31, 2021. The proof of service for the subsequently filed Motion to Vacate corrected one of these errors: Mr. Hurst no longer identifies "Brad Williams" as counsel of record for Brownstein. But the Motion to Vacate proof of service continues to falsely aver that Bart Williams was served by CCES. He was not; nor can he be. Mr. Benenson was also not served with the Motion to Vacate.

Dated: April 9, 2021

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: s/ Richard B. Benenson
Richard B. Benenson, #32566

PROSKAUER ROSE LLP

By: s/ Bart H. Williams
Bart H. Williams, *admitted pro hac vice*
Jennifer L. Roche, *admitted pro hac vice*
Shawn S. Ledingham, Jr., *admitted pro hac vice*

ATTORNEYS FOR BROWNSTEIN HYATT FARBER SCHRECK, LLP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of April, 2021, a true and correct copy of the foregoing BROWNSTEIN HYATT FARBER SCHRECK, LLP'S JOINDER IN RECEIVER'S COMBINED RESPONSE TO CHAD HURST'S (1) EMERGENCY MOTION TO STAY THE COURT'S FEBRUARY 26, 2021, ORDER, AND (2) MOTION TO VACATE THAT ORDER was filed with the Court and served on counsel of record as follows:

<i>Attorneys for Plaintiff:</i> Philip J. Weiser, Attorney General Robert W. Finke, Assistant Attorney General Janna K. Fischer, Assistant Attorney General Email: Robert.Finke@coag.gov	Via CCES
<i>Counsel for Receiver:</i> Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Rachel A. Sternlieb, #51404 ALLEN VELLONE WOLF HELFRICH & FACTOR P.C. Emails: pvellone@allen-vellone.com; mgilbert@allen-vellone.com; rsternlieb@allen-vellone.com	Via CCES
<i>Counsel for Defendant Gary Dragul:</i> Paul L. Vorndran, Atty. Reg. No. 22098 Christopher S. Mills, Atty. Reg. No. 42042 JONES & KELLER, P.C. Emails: pvorndran@joneskeller.com; cmills@joneskeller.com Michael C. Van (<i>admitted pro hac vice</i>) SHUMWAY VAN Email: Michael@shumwayvan.com	Via CCES Via Email
<i>Counsel for Chad Hurst:</i> T. Edward Williams, Atty. No. 41891 WILLIAMS LLP E-mail: edward@williamsllp.com	Via Email

s/ Penny G. Lalonde
Penny G. Lalonde, Paralegal