

DISTRICT COURT, DENVER COUNTY STATE OF COLORADO Denver District Court 1437 Bannock St. Denver, CO 80202	DATE FILED: January 30, 2024 1:48 PM FILING ID: FA252A12DCB87 CASE NUMBER: 2018CV33011
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.	▲ COURT USE ONLY ▲
Attorneys for Defendant Gary Dragul: Paul L. Vorndran, Atty. Reg. No. 22098 Christopher S. Mills, Atty. Reg. No. 42042 Jones & Keller, P.C. 1675 Broadway, 26 <sup>th</sup> Floor Denver, CO 80202 Phone: 303-573-1600 Email: <a href="mailto:pvorndran@joneskeller.com">pvorndran@joneskeller.com</a> <a href="mailto:cmills@joneskeller.com">cmills@joneskeller.com</a>	Case No. 2018CV33011  Courtroom: 424
<b>MOTION TO WITHDRAW AS ATTORNEYS FOR DEFENDANT GARY DRAGUL AND NOTICE OF INTENT TO WITHDRAW</b>	

Pursuant to C.R.C.P. 121, § 1-1(2), Christopher S. Mills and Paul L. Vorndran of the firm Jones & Keller, P.C., who are attorneys of record for Defendant Gary Dragul, hereby respectfully move this Court for an order permitting them and Jones & Keller, P.C. to withdraw as counsel of record for Mr. Dragul, and as grounds therefore state as follows:

**Certification of Conferral**

Pursuant to C.R.C.P. 121 § 1-15(8), undersigned counsel conferred with counsel for Plaintiff on January 24, 2024 via email, and Plaintiff does not oppose this Motion.

1. In accordance with C.R.C.P. 121, § 1-1(2), undersigned counsel, Christopher S. Mills, Paul Vorndran, and Jones & Keller, P.C., hereby give notice of their desire and intent to withdraw from this matter as counsel for Mr. Dragul.

2. Undersigned counsel and Jones & Keller, P.C. request leave to withdraw as counsel of record for Mr. Dragul because Mr. Dragul has requested Jones & Keller withdraw as his counsel.

3. Dates of proceedings in this matter, including trial, will not be delayed or affected by the withdrawal sought herein as there is currently a stay and trial has not been set.

4. During the fourteen-day period before this Motion may be granted under C.R.C.P. 121, § 1-1(2)(b), and any further time before the Court rules on this Motion, undersigned counsel will comply with all pending deadlines.

5. This Motion is being electronically filed with the Court and contemporaneously served on counsel of record for all parties in this action, on unrepresented parties, and upon Defendant Gary Dragul.

6. A proposed order is being submitted herewith.

**NOTICE OF INTENT TO WITHDRAW TO DEFENDANT**

Pursuant to C.R.C.P. 121 § 1-1(2)(b), undersigned counsel provides the following advisements to Defendant Gary Dragul:

1. Defendant Mr. Dragul is hereby notified that even though the undersigned counsel is permitted to withdraw as your counsel, the Court retains jurisdiction over you.

2. You have the burden to keep the Court and other parties informed as to where notices, pleadings or other papers may be served.

3. You have the duty to comply with all Court rules and orders, and to prepare for and attend any hearing(s), and you may suffer possible dismissal, default, or other sanctions should you fail to do so.

4. Unless and until you retain new legal counsel, you are personally responsible for complying with all Court orders and deadlines.

5. The case is currently stayed and there are no pending deadlines.

6. You and the other parties in this action have the right to object to this Motion to Withdraw within 14 days after service of the Motion upon you.

7. Defendant Gary Dragul's last known address and telephone number are 1685 S. Colorado Blvd., S238, Denver, Colorado 80222; 303-518-6888.

#### **CERTIFICATE OF WRITTEN NOTIFICATION**

1. Undersigned counsel Christopher S. Mills, Paul Vorndran, and Jones & Keller, P.C. hereby certify that they have complied with C.R.C.P. 121, § 1-1(2)(b) and have notified Defendant Gary Dragul of their seeking to withdraw as counsel of record in this matter, and have notified all counsel of record and self-represented parties.

2. If no objection has been filed to this Motion to Withdraw within fourteen (14) days of service of this Motion, the Court may grant the undersigned's Motion to Withdraw without a hearing.

3. The undersigned hereby certifies that a true and accurate copy of this Motion to Withdraw and Notice of Intent to Withdraw and proposed form of Order Approving Motion to Withdraw have been served on Defendant Gary Dragul.

WHEREFORE, Christopher S. Mills and Paul Vorndran of Jones & Keller, P.C., respectfully request that this Court enter an Order permitting them, and Jones & Keller, P.C., to withdraw as counsel for Defendant Gary Dragul.

Dated this 30th day of January, 2024.

JONES & KELLER, P.C.

s/ Paul L. Vorndran

Christopher S. Mills, #42042

Paul L. Vorndran, #22098

s/ Christopher S. Mills

Christopher S. Mills, #42042

Paul L. Vorndran, #22098

*ATTORNEYS FOR DEFENDANT GARY J.  
DRAGUL*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of January, 2024, a true and correct copy of the foregoing **MOTION TO WITHDRAW AS ATTORNEYS FOR DEFENDANT GARY J. DRAGUL AND NOTICE OF INTENT TO WITHDRAW** was filed and served via the Colorado Courts E-Filing System upon the following:

Patrick D. Vellone, Esq.  
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Averil K. Andrews, Esq.  
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s/ Emily Morse-Lee  
Emily Morse-Lee

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<p style="text-align: center;"><b>ORDER GRANTING MOTION TO WITHDRAW AS ATTORNEYS FOR DEFENDANT GARY DRAGUL AND NOTICE OF INTENT TO WITHDRAW</b></p>	

THIS MATTER is before the Court on a Motion to Withdraw as Attorneys for Defendant Gary Dragul and Notice of Intent to Withdraw by counsel for Gary Dragul. The Court, having been advised in the premises, hereby finds and orders as follows: the Motion is **GRANTED**. Paul L. Vorndran, Christopher S. Mills, and Jones & Keller, P.C. are permitted to withdraw as counsel for Gary Dragul.

IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2024.

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DISTRICT COURT JUDGE