

<p>DISTRICT COURT, DENVER COUNTY STATE OF COLORADO</p> <p>Denver District Court 1437 Bannock St. Denver, CO 80202 303.606.2433</p>	<p>DATE FILED October 31, 2024 3:31 PM FILING ID: B587A38A2C33D CASE NUMBER: 2018CV33011</p> <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 Receiver:</p> <p>Patrick D. Vellone, #15284 Michael T. Gilbert, #15009 Averil K. Andrews, # 56148 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 aandrews@allen-vellone.com</p>	<p>Case Number: 2018CV33011</p> <p>Division/Courtroom: 424</p>
<p style="text-align: center;">RECEIVER’S MOTION TO SHORTEN TIME FOR HURST TO REPLY TO THE RECEIVER’S OBJECTION TO CHAD HURST’S MOTION TO CONTINUE HEARING</p>	

Harvey Sender, the duly-appointed receiver (“Receiver”) for Gary Dragul (“Dragul”), GDA Real Estate Services, LLC (“GDARES”), GDA Real Estate Management, Inc. (“GDAREM”), and related entities (collectively, “Dragul and the GDA Entities”), hereby moves to shorten the time for Chad Hurst to reply to the Receiver’s Objection to Hurst’s Motion to Continue Hearing on the Receiver’s Motion

to Approve Settlement Agreement with the Clearwater Bankruptcy Estates (“**Motion to Continue**,” filed October 30, 2024).


1. Pursuant to Hurst’s Motion to Continue and Request for Expedited Briefing, on October 31, 2024, the Court entered an order requiring the Receiver to respond to Hurst’s Motion to Continue by November 6, and for Hurst to reply by November 8.

2. Because the hearing date is of pressing importance, the Receiver filed his Objection to the Motion to Continue on October 31. Hurst requested two days to file a reply. The Receiver hereby requests that the Court enter an order requiring Hurst to file a reply, if any, on or before Monday November 4 so that the Court can rule on the Motion to Continue in advance of the November 13th hearing date so that the parties can plan accordingly.

WHEREFORE, the Receiver asks the Court to require Hurst to file his reply in support of the Motion to Continue, if any, on or before November 4.

Dated: October 31, 2024.

ALLEN VELLONE WOLF HELFRICH & FACTOR
P.C.

By: 

s/ Michael T. Gilbert
Patrick D. Vellone, Reg. No. 15284
Michael T. Gilbert, Reg. No. 15009
Averil K. Andrews, Reg. No. 56148

ATTORNEYS FOR THE RECEIVER, HARVEY
SENDER

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2024, I served a true and correct copy of the foregoing **RECEIVER’S MOTION TO SHORTEN TIME FOR HURST TO REPLY TO THE RECEIVER’S OBJECTION TO CHAD HURST’S MOTION TO CONTINUE HEARING** via CCE to:

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

**Counsel for Tung Chan, Securities
Commissioner**

Arthur Tyrone Glover
TYRONE GLOVER LAW, LLC
2590 Walnut St.
Denver, CO 80205
tyrone@tyroneglover.com

Counsel for Gary Dragul

Kevin D. Evans
Evans Law PLLC
5613 DTC Parkway
Suite 850
Greenwood Village, CO 80111
kdevans@evanspllc.law

**Counsel for Lone Pine Resources,
LP**

Aaron A. Garber
Wadsworth Garber Warner Conrardy,
P.C.
2580 West Main Street, Suite 200
Littleton, CO 80120

**Counsel for the Liquidating
Trustee**

Christopher S. Mills
Jones Keller, P.C.
1999 Broadway Street
Suite 3150
Denver, CO 80202
pmills@joneskeller.com

Counsel for Chad Hurst



/s/ Lisa A. Vos
Allen Vellone Wolf Helfrich & Factor P.C.

