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| <p><b>DISTRICT COURT, CITY AND COUNTY OF DENVER,<br/>STATE OF COLORADO</b><br/>1437 Bannock Street<br/>Denver, CO 80202</p>   | <p>DATE FILED<br/>July 7, 2025 7:32 PM<br/>FILING ID: 9F0F4FCD1E498<br/>CASE NUMBER: 2018CV33011</p> |
| <p><b>Plaintiff:</b> TUNG CHAN, Securities Commissioner for the State of Colorado,<br/>v.<br/><b>Defendants:</b> GARY DRAGUL, et al.</p>  | <p><b>▲ COURT USE ONLY</b><br/>▲</p>   |
| <p><i>Attorney for Hagshama-related entities:</i><br/><br/>Kenneth F. Rossman, IV, No. 29249<br/>WOMBLE BOND DICKINSON US LLP<br/>1601 19th Street, Suite 1000<br/>Denver, CO 80202<br/>303.623.9000<br/>ken.rossman@wbd-us.com</p> | <p>Case No: 2018CV033011<br/><br/>Courtroom: 424</p>   |
| <p align="center"><b>HAGSHAMA-RELATED ENTITIES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO RECEIVER'S MOTION TO APPROVE PROPOSED PLAN OF DISTRIBUTION</b></p>   |  |

The Hagshama-related entities that filed claims in the Receivership move for a two-day extension, until July 11, 2025, of their time to respond and oppose the Receiver's Motion to Approve Proposed Plan of Distribution.

The Receiver filed the Motion to Approve Proposed Plan of Distribution on June 18, 2025. The current due date for objections is July 9, 2025. Twenty-three entities Hagshama-related entities filed approximately \$175 million in claims in the Receivership. Those entities are managed by individuals in the United States and Israel. Some are administered by receivers in Israel.

Good cause exists for an extension. Given the number, size, and complexity of the claims, the need to consult individuals in the United States and Israel, the need for receiver approval in Israel, the time difference, and the need to obtain additional information from the Receiver, organizing a response is taking longer than it otherwise might. Undersigned counsel has endeavored to minimize the length of extension required. The Hagshama-related entities that filed claims in the Receivership respectfully request a two-day extension of time to prepare and submit their response to the Motion to Approve Proposed Plan of Distribution.

Counsel for the Receiver advises that the Receiver has no objection to the proposed extension.

July 7, 2025.

Womble Bond Dickinson US LLP

*s/Kenneth F. Rossman, IV*

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Kenneth F. Rossman, IV, No. 29249

*Attorney for the Hagshama-related entities:*

*CoFund 1, LLC*

*CoFund 2, LLC*

*CoFund 5, LLC*

*CoFund 6, LLC*

*CoFund 9, LLC*

*Cassinelli Square 16 A*

*Delta 17 A, LLC*

*GDA Clearwater Investors, LLC*

*GDA-DU Student Housing 18 A, LLC*

*Hagshama Colorado Denver, LLC*

*Hagshama Denver Colorado 2, LLC*

*Hagshama Florida 13 Clearwater, LLC*

*Hagshama Hickory NC, LLC*

*Hagshama Lansing Michigan 1002, LP*  
*Hagshama Ohio Cassinelli, LLC*  
*Hagshama Prospect Square, LLC*  
*Hagshama Tennessee 10 Windsor Gold, LLC*  
*Hagshama Tennessee 10 Windsor Platinum,*  
*LLC*  
*Happy Canyon Box 17 A, LLC*  
*Hickory Corners 16 A, LLC*  
*Hickory Corners Box 16 A, LLC*  
*PS 16, LLC*  
*Windsor 15, LLC*

### **Certificate of Service**

I certify that on July 7, 2025, I filed the foregoing through the Colorado Court's E-filing service, which caused it to be served electronically on all counsel that have appeared.

*s/Kenneth F. Rossman, IV*

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| <b>Plaintiff:</b> TUNG CHAN, Securities Commissioner for the State of Colorado,<br>v.<br><b>Defendants:</b> GARY DRAGUL, et al.  | <p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p> Case No: 2018CV033011<br><br>Courtroom: 424 |
| <b>ORDER GRANTING HAGSHAMA-RELATED ENTITIES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO RECEIVER'S MOTION TO APPROVE PROPOSED PLAN OF DISTRIBUTION</b> |  |

For the reasons stated in the Motion, the Court grants the Hagshama-related entities that filed claims in the Receivership a two-day extension, until July 11, 2025, of their time to respond and oppose the Motion to Approve Proposed Plan of Distribution.

July \_\_, 2025.

District Court Judge

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