

Richard Block

From: Peter B Goldstein, Esq. <peter@gubbelslaw.com>
Sent: Thursday, October 20, 2016 10:39 AM
To: Richard Block
Subject: RE: Converse - Claims - 2015CV031023 - Quisenberry, Patricia Anne v. Quisenberry, Charles Michael et al
Attachments: Transcript of Judgment (recorded in Douglas County 7-11-2016).pdf; Transcript of Judgment (Recorded)(Divorce).pdf

Pursuant to paragraph 15 of the Court's Order re: Order to Present and File Claims dated September 29, 2016, you are hereby notified that Plaintiff's "nonbinding, good faith estimate" of her claim(s) includes the following:

	(judgment amount entered March 31,
\$921,001.31	2016, transcript attached)*
	(judgment amount entered June
\$5,308.00	9, 2016, transcript attached)*
\$926,309.31	Total*

*Plus post-judgment interest accrues thereon at the statutory rate 8% per annum from the dates of entry of the judgments, as well as reasonable attorney's fees and costs of collection, also pursuant to statute, the total amount of which has yet to be determined and is not reflected in the Total.

Peter

Peter B. Goldstein
Attorney at Law
Gubbels Law Office, P.C.
402 North Wilcox Street, Suite 100
Castle Rock, CO 80104-2429
Office: 303-688-1655
Facsimile: 303-688-7511
peter@gubbelslaw.com
<http://www.gubbelslaw.com/>

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From: Richard Block [<mailto:richardblock@xpn.com>]
Sent: Wednesday, September 07, 2016 2:23 PM
To: Baggs_Dana (dbaggs@lflaw.com); Evans_Daniel (deevans@gordonrees.com); Goldstein_Peter (Peter@gubbelslaw.com); Helm_Andrew - Lewis Roca Rothgerber LLP (AHelm@lrrlaw.com); Myers_Alex (amyers@lrrc.com); Skogg_Kenneth (kskogg@lflaw.com); Tanner_Jack (Jtanner@fwlaw.com)
Subject: Converse - Claims Motion

All:

The receiver is going to file a Motion for Order to Present and File Claims. You should have a proposed copy to review fairly soon. This is standard fare for equity receiverships, but has been withheld by informal stipulation in this case. In summary, the Plaintiff did not want the parties to be compelled to file a Claim with the receiver on the basis that the receiver wasn't in position to contribute much to the disputes among the Plaintiff and Defendants. The Defendants were generally in accord, and I agreed with the proposition subject to changing circumstances or Court Orders.

Circumstances have changed, i.e., third parties have asserted claims against assets in the Receivership Estate. At this time, I do not plan on taking a position as to whether the Plaintiff and Defendants should file Claims.

If any of the parties has had a change of mind on this issue, please let me know, and keep in mind that the deadline for submitting documents for the hearing set for September 28th is a week away. As to the issues among the parties that I can see in this case, I believe the exemption should be maintained, but the determination is nowhere near as obvious as it was in the beginning of the receivership.

Rick

Richard A. Block
President
Sterling Consulting Corporation
4101 East Louisiana Avenue
Suite 300
Denver, Colorado 80246
Direct: 303-388-1300
Office: 303-781-9900
Fax: 303-781-4311
Email: rblock@xpn.com

