
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION, Case No: 11-cv-00574-MJD-FLN

Plaintiff(s)

v.

JASON BO-ALAN BECKMAN and
THE OXFORD PRIVATE CLIENT
GROUP, LLC,

Defendant(s)

And

HOLLIE BECKMAN,

Relief Defendant.

**RECEIVER'S MOTION FOR LEAVE TO
FILE REPLY MEMORANDUM REGARDING MOTION TO AUTHORIZE
THE HIRING OF REAL ESTATE AGENTS AND TO PUBLISH NOTICE
OF OFFERS FOR SALE**

R.J. Zayed, Receiver, submits this Motion for Leave to File a Reply Memorandum Regarding his pending motion (ECF No. 93) pursuant to 28 U.S.C. § 2001(b) for the Court to authorize the private sale of the real estate properties of (1) 2400 Paseo del Lago, Mission, Texas 78573 and (2) 7432 Golf Drive, Mission, Texas 78572. In support of this motion, the Receiver attaches its proposed Reply Memorandum, with the attached Declaration of Brian Hayes, as Exhibit A hereto, and states as follows:

In Defendant's Opposition to the Receiver's Motion, Defendant Jason Bo-Alan Beckman makes an invalid legal argument, as well as statements not supported by the factual evidence. While the Receiver did not file a formal memorandum in the initial motion in the interest of conserving investor funds, he now seeks leave to file the attached Reply Memorandum to address the legal issues and factual statements raised for the first time in the Defendant's Opposition.

WHEREFORE, for the reasons set forth herein, the Receiver respectfully requests that this Court permit the filing of the attached Reply memorandum.

Dated: June 8, 2011

Respectfully submitted,

s/ Brian W. Hayes

R.J. Zayed (MN Bar No. 309,849)

Brian W. Hayes (MN Bar No. 294,585)

Tara C. Norgard (MN Bar No. 307,683)

Russell J. Rigby (MN Bar No. 323,652)

Carlson, Caspers, Vandenburg & Lindquist

225 S. 6th Street, Suite 3200

Minneapolis, MN 55402

Telephone: (612) 436-9600

Facsimile: (612) 436-9605

Email: bhayes@ccvl.com