

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

U.S. COMMODITY FUTURES
TRADING COMMISSION,
Plaintiff,

v.

Case No. 09-cv-3332 (MJD/JSM)

TREVOR COOK et al.,
Defendants,

R.J. ZAYED,
Receiver.

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,
Plaintiff,

v.

Case No. 09-cv-3333 (MJD/JSM)

TREVOR G. COOK, et al.,
Defendants,

R.J. ZAYED,
Receiver.

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,
Plaintiff,

v.

Case No. 11-cv-574 (MJD/FLN)

JASON BO-ALAN BECKMAN, et al.,
Defendants,

R.J. ZAYED,
Receiver.

**STIPULATION FOR BRIEFING SCHEDULE FOR RECEIVER'S MOTION TO
ENJOIN THE DISTRIBUTION OF CERTAIN FUNDS IN ESCROW**

The Receiver, R.J. Zayed ("Receiver"), and Dale and Ann Woodbeck, David Dent, Justin Bussler, Laura Owen, Ronald Bisson, Sr., Anne E. Quiggle; Susan R. Gorman and Evangeline M. Olson, individually and as Trustees on behalf of the Arthur W. Quiggle Family Trust; and Charlotte Olson, individually and as Trustee on behalf of the Charlotte J. Olson Family Trust and the Charlotte J. Olson Charitable Remainder Trust (collectively, the "Securities Arbitration Claimants") hereby stipulate and agree to an entry of an Order of the Court as follows:

(1) The Receiver stipulates that it will not contest the Securities Arbitration Claimants' (the Receiver and Securities Arbitration Claimants shall be referred to collectively herein as the "Parties") standing to oppose the Receiver's forthcoming motion, which will be filed on April 29, 2011, to prohibit the distribution of settlement funds or assigned claims (the "Settlement Funds") obtained by the Securities Arbitration Claimants from NRP Financial, Inc., U.S. Fire and Insurance Company, Western International Securities, Inc. and Jason Bo Alan Beckman, some of which are currently being held in escrow by the law firm of Lindquist & Vennum P.L.L.P. The Receiver further acknowledges that the Securities Arbitration Claimants could have sought to intervene pursuant to Federal Rule of Civil Procedure 24(a)(2); however, the Parties agreed to the procedure set forth herein to resolve their dispute in an expeditious manner, while also trying to minimize the burden to the court. The Receiver and Securities Arbitration Claimants disagree as to whether the Settlement Funds fall within the scope of the following Orders of the Court: Order Imposing Asset Freeze and Other Ancillary Relief and

Setting Hearing on Motion for Preliminary Injunction (Civil Action No. 11-CV-574) dated March 8, 2011 (Docket No. 9); Order Appointing Receiver (Civil Action No. 11-CV-574) dated March 8, 2011 (Docket No. 10); Order of Preliminary Injunction, Asset Freeze, and Other Ancillary Relief as to Defendant Jason Bo-Alan Beckman dated March 11, 2011 (Civil Action No. 11-CV-574) (Docket No. 20); Order Imposing Asset Freeze and Other Ancillary Relief and Setting Hearing on Motion for Preliminary Injunction (Civil Action No. 09-CV-3333) dated November 23, 2009 (Docket No. 14); and Order of Preliminary Injunction, Asset Freeze, and Other Ancillary Relief (Civil Action No. 09-CV-3333) dated December 9, 2009 (Docket No. 51); Second Amended Order Appointing Receiver (Civil Action No. 09-CV-3333) dated December 11, 2009 (Docket No. 68); Order Continuing Appointment of Temporary Receiver (Civil Action No. 09-CV-3332) dated December 11, 2009 (Docket No. 96); and

(2) The Parties agree that these issues may appropriately be heard by the Court on an expedited basis pursuant to the following briefing schedule:

Opening brief filed by the Receiver (20 page limit) by	April 29, 2011
Response brief by the Securities Arbitration Claimants (20 page limit) by	May 13, 2011

(3) The Parties further agree and stipulate that if the Receiver determines he needs to file a Reply, he shall do so on or before **May 20, 2011** (limited to 10 pages) and the Securities Arbitration Claimants shall be permitted to file a Sur-Reply (limited to 10 pages) on or before **May 27, 2011**.

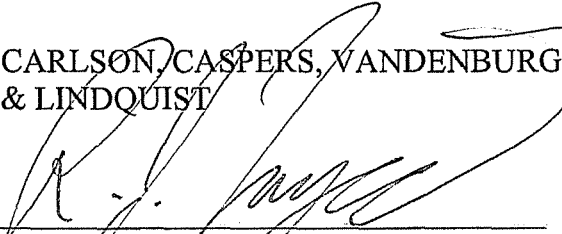
(4) The Parties further agree and stipulate that they will seek the first available hearing date from the Court once the briefing above has been completed.

Counsel for the Receiver

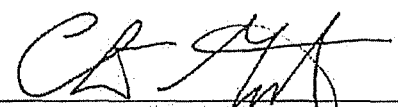
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