

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

R.J. ZAYED, IN HIS CAPACITY AS
COURT- APPOINTED RECEIVER FOR
TREVOR G. COOK, ET AL.,
Petitioner,

Case No. 11-CV-01042 SRN/FLN

vs.

DAVID BUYSSE, STEVEN AND
PAMELA CHENEY, WALTER DEFIEL,
JOHN DZIK, TERRY FRAHM,
STEVEN AND JENENE FREDELL,
WILLIAM HARRIS, MICHAEL HEISE,
MICHAEL AND CYNTHIA HILLESHEIM,
LARRY HOPFENSPIRGER, STEVEN
KAUTZMAN, JAMES MCINTOSH,
GEORGE AND KAREN MORISSET,
AND REYNOLD SUNDSTROM, AND
DOT ANDERSON,

Respondents.

LENDER RESPONDENTS' MOTION FOR LEAVE TO DEPOSE TREVOR COOK

TO: THE RECEIVER, AND HIS ATTORNEYS, TARA NORGARD, RUSSELL J.
RIGBY AND PETER K. KOHLHEPP, CARLSON, CASPERS, VANDENBURGH &
LINDQUIST, P.A., 225 S. SIXTH ST., SUITE 3200, MINNEAPOLIS, MN 55402.

MOTION

Lender Respondents Steven and Pamela Cheney, David Buysse, Walter Defiel,
Steven and Jenene Fredell, Michael and Jennifer Heise, Michael and Cynthia Hillesheim,

Larry Hopfenspirger, Steven Kautzman, James McIntosh, George and Karen Morisset, Terry Frahm, and Reynold and Judith Sundstrom move the Court as follows:

1. For an Order under Federal Rule of Civil Procedure 30(a)(2)(B) for leave to depose Trevor Cook; and
2. For such other and further relief as the Court may deem just and proper.

This Motion will be based on the Lender Respondents' Memorandum of Law in Support of the Motion, and arguments of counsel. The Court is authorized to grant this relief as an exercise of its discretion as expressed in Fed. R.Civ.Pro. 30(a)(2) and 26(b)(2), and by applicable federal case law.

Dated: May 27, 2011.

MOHRMAN & KAARDAL, P.A.

s/Gregory M. Erickson
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