

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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R.J. ZAYED, RECEIVER,

Plaintiff

Case No: 011-cv-1042 SRN/FLN

v.

David Buysse, Steven and Pamela Cheney,  
Walter Defiel, John Dzik, Terry Frahm,  
Steven and Jenene Fredell, William Harris,  
Michael and Jennifer Heise,  
Michael and Cynthia Hillesheim, Larry Hopfenspirger,  
Steven Kautzman, James McIntosh,  
George and Karen Morisset, Reynold Sundstrom, and  
Dot Anderson,

Respondents

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**NOTICE OF MOTION IN SUPPORT OF  
RECEIVER'S MOTION FOR PROTECTIVE ORDER**

Please take notice that on October 3, 2011, at 10:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom 9W, United States Courthouse, 300 South Fourth Street, Minneapolis, MN 55415, R.J. Zayed, Receiver, will move the Court to issue a Protective Order pursuant to Federal Rule of Civil Procedure Rule 26 barring the Respondents from deposing either the Receiver individually or the Receivership under Federal Rule of Civil Procedure 30(b)(6).

Respectfully submitted,

Dated: September 8, 2011

s/ Peter M. Kohlhepp

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

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