

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

R.J. ZAYED, In His Capacity)	CIVIL ACTION
As Court-Appointed Receiver)	
For The Oxford Global Partners, LLC,)	File No.: 13-cv-00232 (DSD-JSM)
Universal Brokerage FX, and Other)	
Receiver Entities,)	
)	
Plaintiff,)	
v.)	
)	
ASSOCIATED BANK, N.A.,)	
)	
Defendant.)	

**DECLARATION OF KEITH VOGT
IN SUPPORT OF PLAINTIFF’S MOTION TO
DE-DESIGNATE DOCUMENTS AND UNSEAL COMPLAINT**

I, Keith Vogt, hereby declare and state as follows:

1. I am an attorney with the law firm of Stadheim and Grear, Ltd and represent the Plaintiff Court-appointed Receiver, R.J. Zayed, in the above-captioned matter. I submit this declaration in support of Plaintiff’s Motion to De-Designate Documents and Unseal Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of the Stipulated Protective Order filed in the ancillary Receivership case captioned *SEC v. Trevor Cook, et al.*, No. 09-cv-3333, Doc. 879 (D. Minn. Aug. 3, 2011).

3. Pursuant to Local Rule 7.1(a), I met-and-conferred in good faith with counsel for Defendant Associated Bank regarding the facts at issue in this motion by telephone on February 8, 2013 and by email on February 4, 11-12, 14, 19-20, 2013.

Opposing counsel for Defendant Associated Bank, N.A., Alex C. Lakatos, and I were able to resolve and agree to some but not all of the issues addressed in the instant motion.

4. Attached hereto as Exhibit B is a true and correct copy of a table describing those documents filed under seal with the Receiver's Complaint in this action and Associated Bank position on the unsealing of each document.

Under penalty of perjury, I swear the above is true and correct.

Dated: February 21, 2013

By: s/ Keith Vogt
Keith Vogt