

**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.)	

**PLAINTIFF’S MOTION TO DE-DESIGNATE
DOCUMENTS AND UNSEAL COMPLAINT**

Plaintiff R.J. Zayed, Court-appointed Receiver for the Oxford Global Partners, LLC, Universal Brokerage FX, and other Receiver Entities (“Receiver”) hereby moves the Court for an Order that 1) de-designates certain documents subject to a Stipulated Protective Order [No. 09-cv-3333, Doc. 870 (D. Minn. Aug. 3, 2011)] and 2) unseals the redacted Complaint filed in this action [Dkt. No. 1] so that the entire Complaint, and all exhibits referenced in and incorporated thereto, may be made available to the public and the many interested parties in this litigation.

The documents which the Plaintiff Receiver respectfully requests the Court de-designate are all exhibits filed under seal with the Complaint in this action [Dkt. No. 1]. The exhibits at issue in this motion are as follows:

- Exhibit 3
- Exhibit 5
- Exhibit 6
- Exhibit 7
- Exhibit 8
- Exhibit 9
- Exhibit 10
- Exhibit 13
- Exhibit 16
- Exhibit 17
- Exhibit 18
- Exhibit 19
- Exhibit 21
- Exhibit 22
- Exhibit 23
- Exhibit 24
- Exhibit 27
- Exhibit 29
- Exhibit 30
- Exhibit 31
- Exhibit 32
- Exhibit 33
- Exhibit 34
- Exhibit 35
- Exhibit 36
- Exhibit 37

This motion is based on the files, records and proceedings herein, and any such other evidence or argument that may be presented to the Court.

Dated: February 21, 2013

s/ Brian W. Hayes

R.J. Zayed (MN Bar No. 309,849)
Tara C. Norgard (MN Bar No. 307,683)
Brian W. Hayes (MN Bar No. 294,585)
Russell J. Rigby (MN Bar No. 323,652)
Brenton A. Elswick (MN Bar No. 388,816)
Carlson, Caspers, Vandenburg, Lindquist
& Schuman, P.A.
225 S. Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: (612) 436-9600
Facsimile: (612) 436-9605
Email: rzayed@carlsoncaspers.com

SPECIAL LITIGATION COUNSEL TO THE RECEIVER:

s/ Keith Vogt

Keith A. Vogt (*pro hac vice*)

IL Bar No. 6207971

Stadheim & Grear Ltd.

400 N. Michigan Avenue, Suite 2200

Chicago, IL 60611

Telephone: (312) 755-4400

Facsimile: (312) 755-4408

Email: vogt@stadheimgrear.com

*Attorneys for R.J. ZAYED, In His Capacity As
Court-Appointed Receiver for The Oxford
Global Partners, LLC, Universal Brokerage FX,
and Other Receiver Entities*