

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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

Plaintiff,

vs.

ASSOCIATED BANK, N.A.,

Defendant.

Case No. 13-cv-00232 (DSD-JSM)

**Defendant Associated Bank, N.A.'s Motion to Compel the Receiver's Designee  
To Attend the Rule 30(b)(6) Depositions of  
Crown Forex, LLC and Oxford Global FX, LLC**

Under Rules 30(b)(6) and 37 of the Federal Rules of Civil Procedure, Associated Bank, N.A. ("Associated Bank") hereby moves to compel plaintiff R.J. Zayed ("the Receiver") to designate a witness to testify on topics 4, 6, 17, and 18 of Associated Bank's Rule 30(b)(6) deposition notices to Oxford Global FX, LLC and Crown Forex, LLC. As explained further in Defendant Associated Bank, N.A.'s Memorandum of Law In Support of Its Motion to Compel the Receiver's Designee to Attend the Rule 30(b)(6) Depositions of Crown Forex, LLC and Oxford Global FX, LLC, the Receiver has refused to designate a Rule 30(b)(6) witness to testify on any topic noticed by Associated Bank. Therefore, under Rule 37(a), the Court should compel the Receiver to

designate Rule 30(b)(6) witnesses to testify on these topics on behalf of Oxford Global FX, LLC and Crown Forex, LLC.

Dated: April 12, 2016

s/ Charles F. Webber  
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