

**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.)	

AMENDED MEET-AND-CONFER STATEMENT

I, Keith Vogt, representing Plaintiff R.J. Zayed, Court-appointed Receiver for the Oxford Global Partners, LLC, Universal Brokerage FX, and Other Receiver Entities (“Plaintiff”) hereby certify that:

I met and conferred with the opposing party by:

Meeting with Alex C. Lakatos, counsel for Defendant Associated Bank, N.A., on Friday, February 8, 2013 (by telephone) and on Monday, February 4, 2013, Monday, February 11, 2013, Tuesday, February 12, 2013, Thursday, February 14, 2013, Tuesday, February 19, 2013, and Wednesday, February 20, 2013 (by email) to discuss and agree to a stipulation regarding the de-designation of all exhibits referenced in and incorporated with the Complaint, and to the unsealing of the redacted Complaint, filed in the instant action [Dkt. No. 1].

As a result of the meet-and-confer, the parties agreed on parts of the Motion and respectfully request that the Court incorporate the following agreement in an order:

The Motion is partially granted and the following Exhibits are to be de-designated and the Complaint shall be unsealed as to these specific Exhibits:

- Exhibit 3
- Exhibit 5
- Exhibit 7, ABCCVL001187
- Exhibit 13
- Exhibit 17
- Exhibit 18
- Exhibit 19, ABCCVL001045
- Exhibit 22
- Exhibit 32
- Exhibit 34, AB09559
- Exhibit 36, first page
- Exhibit 37, Smith Emails and ABCCVL000177

Attached hereto is a chart indicating on which documents the parties have agreement, on which the parties are in dispute, and on which further Court action is needed as a result of Associated Bank taking no position on the unsealing of a document. This chart is also incorporated as Exhibit B to the Declaration of Keith Vogt, filed with these pleadings. Those matters not agreed to as described above are at issue in the motion hearing noticed for March 8, 2013 at 2:30 p.m.

Dated: February 21, 2013

s/ Brian W. Hayes
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SPECIAL LITIGATION COUNSEL TO THE RECEIVER:

s/ Keith A. Vogt _____

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