

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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

Plaintiff,

vs.

ASSOCIATED BANK, N.A.,

Defendant.

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

**MEMORANDUM IN SUPPORT OF THE PARTIES JOINT STIPULA-
TION TO MODIFY PRETRIAL SCHEDULING ORDER**

Pursuant to Fed. R. Civ. P. 16(b)(4) and D. Minn. Civ. R. 16.3, Defendant Associated Bank, N.A. and Plaintiff R.J. Zayed submit this memorandum in support of their Joint Stipulation to Modify the Pretrial Scheduling Order in this case (ECF No. 107), which is filed contemporaneously herewith.

**I. GOOD CAUSE EXISTS FOR THE PROPOSED MODIFICATION
[D. MINN. CIV. R. 16.3(b)(1)]**

As the Court is aware, this is a complicated case that presents a number of difficult legal and logistical issues, both for the parties and for the Court. The parties have been working and continue to work diligently to meet court designated deadlines. This extension is not sought for the purposes of delay; the parties simply need additional time to complete expert discovery

prior to the submission of dispositive and non-dispositive motions and moving toward trial.

II. THE PROPOSED MODIFICATION WILL HAVE NO EFFECT ON OTHER DEADLINES [D. MINN. CIV. R. 16.3(b)(2)]

A twenty-one day extension to the deadline for dispositive and non-dispositive motions would necessitate no further modifications to the pre-trial or trial schedule.

III. CONCLUSION

For the foregoing reasons, the parties respectfully request that the Court grant their Joint Stipulation to Modify the Pretrial Scheduling Order and extend the deadline for dispositive and non-dispositive motions by twenty-one days, up to and including Friday, October 21, 2016.

Dated: September 26, 2016

Respectfully submitted,

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September 26, 2016

Seen and agreed,

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