

**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)

**THE RECEIVER’S MOTION TO COMPEL PRODUCTION OF  
LITIGATION HOLD NOTICES AND INSPECTION  
OF DOCUMENT REPOSITORIES OF TWO KEY WITNESSES**

Plaintiff R.J. Zayed (“the Receiver”) hereby moves to compel Associated Bank (“the Bank”) to produce litigation hold notices. The Receiver also moves to compel inspection of document repositories of two key witnesses (Lien Sarles and Stephen Bianchi).

As explained further in the Receiver’s Memorandum of Law in Support of Its Motion to Compel Production of Litigation Hold Notices and Inspection of Document Repositories of Two Key Witnesses, the Receiver has found indicia of spoliation. Therefore, the Court should compel production of litigation hold notices and inspection of document repositories of Mr. Sarles and Mr. Bianchi.

Dated: October 20, 2016

Respectfully submitted,

/s/ William W. Flachsbart

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*Attorneys for Plaintiff R. J. Zayed, in His  
Capacity as Court-Appointed Receiver*

**CERTIFICATE OF SERVICE**

The undersigned attorney of record certifies that on October 20, 2016, copies of the foregoing document were served upon counsel for Defendant via e-mail to the following addresses:

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/s/ William W. Flachsbart

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