

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,

Court File No. 13-232 (DSD/JSM)

**Associated Bank's Motion
For Summary Judgment**

vs.

Associated Bank, N.A.,

Defendant.

Defendant Associated Bank, N.A., hereby moves under Rule 56 of the Federal Rules of Civil Procedure for summary judgment on all of the plaintiff's claims in this case on the grounds that: 1) there is no evidence to support plaintiff's claim that Associated Bank had actual knowledge that it was aiding and abetting wrongful conduct; 2) there is no evidence to support plaintiff's claim that Associated Bank provided substantial assistance to anyone committing wrongful conduct; and 3) there is no evidence to support plaintiff's damages claim. A more particular statement of the grounds for this motion will be set forth in Associated Bank's Memorandum in Support of Motion for Summary Judgment, which will be filed and served as provided in the Court's

Order Regarding Dispositive Motion Procedure, dated October 19, 2016 (ECF No. 159).

Dated: October 21, 2016

FAEGRE BAKER DANIELS LLP

/s/ Charles F. Webber

Charles F. Webber
Bar Number 215247
Attorneys for Defendant
Associated Bank, N.A.
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
Telephone: (612) 766-7000
Fax: (612) 766-1600
chuck.webber@FaegreBD.com

Alex C. Lakatos
Stephen M. Medlock
E. Brantley Webb
Attorneys for Defendant
Associated Bank, N.A.
MAYER BROWN LLP
1999 K Street NW
Washington, DC 20006
Telephone: (202) 263-3000
Fax: (202) 263-3300
alakatos@mayerbrown.com
(admitted pro hac vice)