

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.

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

**Associated Bank's Motion
To Exclude The Testimony of
Ms. Catherine Ghiglieri**

Defendant Associated Bank, N.A., hereby moves under Fed. R. Evid. 702, *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), and Fed. R. Evid. 403 to exclude the expert report and testimony of plaintiff's expert, Ms. Catherine Ghiglieri, on the grounds that: 1) Ms. Ghiglieri's testimony is not relevant and is therefore unhelpful to the finder of fact, and 2) Ms. Ghiglieri's testimony will mislead the finder of fact and confuse the issues. A more particular statement of the grounds for this motion will be set forth in Associated Bank's Memorandum in Support of Motion to Exclude Testimony of Catherine Ghiglieri, 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

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/s/ Charles F. Webber

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