

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

| | | |
|------------------------|---|---------------------------------|
| R. J. ZAYED, as Court- |) | CIVIL ACTION |
| Appointed Receiver, |) | |
| |) | File No.: 13-cv-00232 (DSD-JSM) |
| Plaintiff, |) | |
| v. |) | |
| |) | |
| ASSOCIATED BANK, N.A., |) | |
| |) | |
| Defendant. |) | |

**STAR TRIBUNE’S MOTION TO INTERVENE AND
TO UNSEAL DOCUMENTS**

The *Star Tribune* hereby moves the Court for an Order 1) permitting the *Star Tribune* to intervene in this action for the limited purpose of challenging the scope of the existing Protective Order [No. 09-cv-3333, Doc.870 (D. Minn. Aug. 3, 2011)], and 2) to unseal the redacted Complaint filed in this action [Dkt. No. 1] so that the entire Complaint, and all exhibits referenced in and incorporated into the Complaint, may be made available to the public in this litigation.

The documents which the *Star Tribune* respectfully requests the Court to unseal are all exhibits filed under seal with the Complaint in this action [Dkt. No. 1].

This motion is based on the files, records and proceeding herein, and on any additional evidence or argument that may be presented to the Court.

DATED: February 22, 2013

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