

**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)

**Defendant Associated Bank, N.A.'s Motion for Attorneys' Fees Pursuant to
Rule 37(c)(2)**

Defendant Associated Bank, N.A. hereby moved under Rule 37(c)(2) for an order granting it attorneys' fees on the grounds that: (1) Associated Bank propounded requests for admission to the Receiver, R.J. Zayed, asking the Receiver to admit or deny whether he had evidence that certain current and former Associated Bank employees knew about the Ponzi scheme, (2) Receiver denied ten of these requests for admission, (3) at summary judgment, Associated Bank demonstrated that there was no evidence that any of these individuals knew about the Ponzi scheme, and (4) in its opinion granting Associated Bank's motion for summary judgment, the Court concluded that there was no evidence that any Associated Bank employee knew about the Ponzi scheme. A more particular statement of the grounds for

this motion is set forth in Associated Bank's Memorandum in Support of its Motion for Attorneys' Fees. In light of the size and complexity of the fees Associated Bank incurred as a result of Receiver's denials, Associated Bank respectfully requests 30 days from the resolution of this motion to provide proof of its attorneys' fees and expenses.

Dated: February 15, 2017

s/ Charles F. Webber

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