

**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)

**DECLARATION OF ALEX C. LAKATOS IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFFS' MOTION TO DE-DESIGNATE DOCUMENTS AND  
UNSEAL COMPLAINT**

I, Alex C. Lakatos, hereby declare as follows:

1. The following facts are of my own personal knowledge, and if called as a witness I could and would testify competently as to their truth.

2. I am a partner in the law firm Mayer Brown LLP, and represent defendant Associated Bank, N.A., in the above-captioned matter.

3. Attached to this declaration as Exhibit A is a true and correct copy of the letter I sent to Brian Hayes, counsel for the Receiver, on October 27, 2011.

4. Attached to this declaration as Exhibit B is a true and correct copy of the letter of the letter Brian Hayes sent me in response on October 27, 2011.

5. Attached to this declaration as Exhibit C is a true and correct copy of e-mail correspondence between Keith Vogt and myself on February 19 and 20, 2013.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of March, 2013, at Washington D.C.

s/ Alex C. Lakatos

Alex C. Lakatos