

**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-SER)

**DECLARATION OF MICHAEL R. LA PORTE
IN SUPPORT OF THE RECEIVER'S RESPONSE IN OPPOSITION TO
ASSOCIATED BANK'S MOTION FOR ATTORNEYS' FEES PURSUANT TO
RULE 37(c)(2) AND THE RECEIVER'S REQUEST FOR SANCTIONS
UNDER RULE 37(a)(5)(B)**

I, Michael R. La Porte, being over the age of 18 and being competent to testify to the facts below, state as follows:

1. I am counsel of record to the Receiver in this matter.
2. Attached as Exhibit A is a true and correct copy of defendant Associated Bank, N.A.'s First Set of Requests for Admission.
3. Attached as Exhibit B is a true and correct copy of defendant Associated Bank, N.A.'s Third Set of Requests for Admission.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 6, 2017

/s/ Michael R. La Porte

CERTIFICATE OF SERVICE

The undersigned attorney of record certifies that on April 6, 2017, copies of the foregoing document were served upon counsel for Defendant via e-mail to the following addresses:

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Stephen M. Medlock
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Charles F. Webber
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/s/ William W. Flachsbart

William W. Flachsbart