

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

R.J. ZAYED, In His Capacity	)	CIVIL ACTION
As Court-Appointed Receiver	)	
For The Oxford Global Partners, LLC,	)	File No.: _____
Universal Brokerage FX, and Other	)	
Receiver Entities,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
Associated Bank, N.A.,	)	
	)	
Defendant.	)	

**MOTION TO FILE COMPLAINT UNDER SEAL**

R.J. Zayed, the Receiver appointed by the Court pursuant to *SEC v. Cook, et al.*, No. 09-cv-3333, Doc. 68 (D. Minn. Dec. 11, 2009), *CFTC v. Cook, et al.*, No. 09-cv-3332, Doc. 96 (D. Minn. Dec. 11, 2009), and *SEC v. Beckman, et al.*, No. 11-cv-574, Doc. 10 (D. Minn. Mar. 8, 2011) (hereafter, “the Receiver”) respectfully moves this Court for permission to file a complaint and accompanying exhibits under seal in a new ancillary action under the above-designated caption.

This motion is made pursuant to the Stipulated Protective Order on file with the Court [*SEC v. Cook*, No. 09-cv-3333, Doc. 870 (Aug. 3, 2011)], which requires many of the documents referenced in and attached to the complaint at issue in this motion to be filed under seal; Local Rule 79.1 for the United States District Court for the District of Minnesota; and Federal Rule of Civil Procedure 5.2. This motion is also based on the

files, records and proceedings herein, and any such other evidence or argument that may be presented to the Court.

For these reasons, the Receiver respectfully requests that the Court grant this Motion to File Complaint Under Seal.

Dated: January 29, 2013

Respectfully submitted,

s/ R.J. Zayed

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