

No. 13-3388

**IN THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

R.J. Zayed, In His Capacity As Court-Appointed Receiver For
The Oxford Global Partners, LLC, Universal Brokerage FX,
And Other Receiver Entities,

Plaintiff-Appellant,

– v. –

Associated Bank, N.A.,

Defendant-Appellee.

On Appeal from the United States District Court for the
District of Minnesota
(No. 3:13-cv-00232-DSD)
The Honorable David S. Doty

**PARTIAL OPPOSITION TO THE APPELLANT'S
MOTION FOR EXTENSION OF TIME**

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CORPORATE DISCLOSURE STATEMENT

Associated Bank, N.A., is wholly owned by Associated Banc-Corp, a publicly traded company.

**PARTIAL OPPOSITION TO THE APPELLANT’S
MOTION FOR EXTENSION OF TIME**

Associated Bank, N.A. (“Associated”) does not object to a request for extension of time that is accompanied by an attorney’s good-faith representation that existing deadlines would impose personal hardship in light of competing deadlines, travel, or personal matters. To the extent that such a basis underlies the Receiver’s motion, Associated does not oppose a modest, finite extension of time.

Associated does, however, oppose the Receiver’s request for what amounts to a stay of briefing—that its reply brief be due after the Court’s resolution of the co-pending motion for “clarification.” For reasons Associated explains in the co-pending opposition, that motion is wholly without merit. Moreover, it is an issue best left to the merits panel. The resolution of this case should not be stayed indefinitely.¹

CONCLUSION

The Court should not effectively stay this proceeding.

¹ Notwithstanding the Receiver’s concern about the time it would take to brief these motions, Associated has filed its responsive papers the business day following the Receiver’s own motion.

Dated: February 18, 2014

Respectfully submitted,

/s/ Charles A. Rothfeld

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CERTIFICATE OF SERVICE

The undersigned counsel for Defendant-Appellee certifies that the foregoing partial opposition to the appellant's motion for an extension of time was served via the Court's electronic CM/ECF system on February 18, 2014.

Dated: February 18, 2014

/s/ Charles A. Rothfeld
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