

**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 TO COMPEL
RESPONSES TO ITS FIRST SET OF REQUESTS FOR ADMISSION**

Under Rules 36 and 37 of the Federal Rules of Civil Procedure, Associated Bank, N.A. (“Associated Bank”) hereby moves to compel Plaintiff R.J. Zayed (“the Receiver”) to conduct reasonable inquiry and to provide full and complete responses to Associated Bank’s First Set of Requests for Admission (“Requests”). As explained further in the Memorandum in support of this Motion, the Receiver has failed to meet his obligation to respond to Requests 2-5, 8-9, and 11 according to the requirements of Fed. R. Civ. P. 36(a)(4). Therefore, under Rule 37(a), the Court should compel the Receiver to provide full and complete responses admitting or denying each of Associated Bank’s Requests for Admission 2-5, 8-9, and 11, or, in the

alternative, to provide:

- 1) a detailed description of the steps the Receiver took to attempt to obtain the information which would enable him to admit or deny,
- 2) the information the Receiver obtained, and
- 3) a detailed statement regarding why the information readily available to the Receiver did not enlighten him such that he could either admit or deny the requests.

This Motion is supported by the attached Memorandum of Law, the Declaration of Stephen M. Medlock, Esq., and supporting Exhibits, and any reply brief and further argument that counsel may submit.

Dated: December 9, 2015

Respectfully,

s/ Charles F. Webber

Charles F. Webber

Bar Number 215247

Attorney for Defendant

Associated Bank, N.A.

FAEGRE BAKER DANIELS LLP

2200 Wells Fargo Center 90 South

Seventh Street

Minneapolis, MN 55402-3901

Telephone: (612) 766-7000

Fax: (612) 766-1600

chuck.webber@FaegreBD.com

Alex C. Lakatos
Stephen M. Medlock
E. Brantley Webb
Attorneys for Defendant
Associated Bank, N.A.
MAYER BROWN LLP
1999 K Street NW
Washington, DC 20006
Telephone: (202) 263-3000
Fax: (202) 263-3300
alakatos@mayerbrown.com
(*admitted pro hac vice*)