## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

U.S. COMMODITY FUTURES
TRADING COMMISSION,
Plaintiff,

Case No. 09-cv-3332 (MJD/FLN) v.

TREVOR COOK et al..

Defendants,

R.J. ZAYED,

Receiver.

**UNITED STATES SECURITIES** AND EXCHANGE COMMISSION, Plaintiff,

Case No. 09-cv-3333 (MJD/FLN) v.

TREVOR G. COOK, et al.,

Defendants,

R.J. ZAYED,

Receiver.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION, Plaintiff,

11-cv-574 (MJD/FLN) Case No. v.

JASON BO-ALAN BECKMAN, et al.,

Defendants,

R.J. ZAYED,

Receiver.

## MOTION TO APPROVE THE PAYMENT OF FEES INCURRED BY THE RECEIVER THAT WERE NECESSARY TO ASSIST THE RECEIVER IN HIS DUTIES

R.J. Zayed, Receiver, respectfully moves this Court for an Order directing the Receiver to make payments out of assets of the Receivership for fees incurred by the Receiver in or about December 2013, and January and February 2014, for services that were necessary to assist the Receiver in his duties, as follows:

1. Carlson, Caspers, Vandenburgh, Lindquist & Schuman, P.A.

December 2013   Legal fees \$12,044.25   Incurred Costs \$ 598.50
January 2014   Legal fees \$28,041.75   Incurred costs \$ 788.23
February 2014   Legal fees \$18,466.00   Incurred costs \$68.26
TOTAL\$60,006.99
2. Morgan & Morgan
August 2013 \$ 632.64
November 2013\$3,094.21
December 2013\$6,634.77
January 2014\$ <u>460.28</u>
TOTAL\$10,821.90

This motion is supported by an accompanying declaration of the Receiver, arguments of counsel, and the files and proceedings herein.

## Respectfully submitted,

Dated: March 31, 2014 CARLSON, CASPERS, VANDENBURGH, LINDQUIST & SCHUMAN, P.A.

s/ Tara C. Norgard

Tara C. Norgard (MN Bar No. 307,683) Russell J. Rigby (MN Bar No. 323,652) Brian W. Hayes (MN Bar No. 294,585)

Carlson, Caspers, Vandenburgh, Lindquist & Schuman, P.A. 225 S. 6th Street, Suite 4200 Minneapolis, MN 55402

Telephone: (612) 436-9600 Facsimile: (612) 436-9605

Email: <u>tnorgard@carlsoncaspers.com</u> *Attorneys for Receiver R.J. Zayed*