

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

U.S. COMMODITY FUTURES  
TRADING COMMISSION,  
Plaintiff,

v.

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

TREVOR COOK et al.,  
Defendants,

R.J. ZAYED,  
Receiver.

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UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,  
Plaintiff,

v.

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

TREVOR G. COOK, et al.,  
Defendants,

R.J. ZAYED,  
Receiver.

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UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,  
Plaintiff,

v.

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

JASON BO-ALAN BECKMAN, et al.,  
Defendants,

R.J. ZAYED,  
Receiver.

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**MOTION FOR LEAVE TO RECUSE**

The Receiver, R.J. Zayed, hereby moves the Court for leave to recuse himself from *Zayed v. Associated Bank*, No. 13-cv-0232 (DSD/JSM) (the "Associated Bank Action") effective March 31, 2013. In support of this motion, the Receiver states as follows:

1. The Receiver is leaving Carlson, Caspers, Vandenburg, Lindquist, & Schumann, P.A. ("Carlson Caspers") effective March 31, 2013, and joining Dorsey & Whitney, LLP ("Dorsey") effective April 2, 2013. The Receiver will continue to work closely with Carlson Caspers as his primary law firm with respect to the Receivership until its conclusion.

2. Although the Court approved the retention of outside contingency fee counsel to bring and handle the Associated Bank Action, out of an abundance of caution and to avoid any possible conflict or even the appearance of a possible conflict as a result of the Receiver joining Dorsey, the Receiver respectfully requests that he be allowed to recuse himself from the Associated Bank Action.

3. To ensure an orderly transition and no disruption to the Associated Bank Action, the Receiver further requests that the Court enter an order authorizing Tara Norgard, Brian Hayes, and Russell Rigby of Carlson Caspers to act collectively on his behalf and in his capacity as Receiver in the Associated Bank Action, with all the powers appertaining thereto as set forth in the Court's orders appointing the Receiver. (*SEC v.*

*Cook*, et. al., 09-cv-3333, Dkts. 13,18 and 68; *CFTC v. Cook*, et. al., 09-cv-3332, Dkts. 21 and 96; and *SEC v. Beckman*, et. al., 11-cv-574, Dkt. 10.).

Respectfully submitted,

Dated: March 28, 2013

s/ R. J. Zayed  
R.J. Zayed (MN Bar No. 309,849)  
Carlson, Caspers, Vandenburg, Lindquist &  
Schuman, P.A.  
225 South Sixth Street, Suite 4200  
Minneapolis, MN 55402  
Telephone: (612) 436-9600  
Facsimile: (612) 436-9605  
Email: rzayed@carlsoncaspers.com