

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff,

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

v.

JASON BO-ALAN BECKMAN, et al.,

Defendants,

R.J. ZAYED,

Receiver.

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**NON-PARTY EVEREST INDEMNITY INSURANCE COMPANY'S**  
**RENEWED MOTION TO LIFT ASSET FREEZE**  
**TO PERMIT PAYMENT OF DEFENSE COSTS**

Non-party Everest Indemnity Insurance Company (“Everest”) respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 71, for entry of an Order granting limited relief from this Court’s Order Imposing an Asset Freeze and Other Ancillary Relief and Setting Hearing on Motion for Preliminary Injunction, dated March 8, 2011 (ECF 9) to the extent applicable to permit Everest to pay its Insureds’ defense costs in the amount of \$234,055.74

This motion is based on the notice of hearing, memorandum of law, affidavits, exhibits, and proposed order submitted herewith, the pleadings and papers on file in this action, and the argument of counsel.

WHEREFORE, Everest Indemnity Insurance Company respectfully requests that this Court grant its Renewed Motion to Lift Asset Freeze to Permit Payment of Defense Costs.

Dated: December 20, 2013

s/ Laura C. Sands

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