

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff(s)

Case No. 09-CV-3332 MJD/FLN

v.

TREVOR COOK d/b/a CROWN
FOREX, LLC, PATRICK KILEY
d/b/a CROWN FOREX, LLC,
UNIVERSAL BROKERAGE FX and
UNIVERSAL BROKERAGE FX
DIVERSIFIED, OXFORD GLOBAL
PARTNERS, LLC, OXFORD GLOBAL
ADVISORS, LLC, UNIVERSAL
BROKERAGE FX ADVISORS, LLC
f/k/a UBS DIVERSIFIED FX
ADVISORS, LLC, UNIVERSAL
BROKERAGE FX GROWTH, L.P.
f/k/a UBS DIVERSIFIED FX GROWTH,
L.P., UNIVERSAL BROKERAGE FX
MANAGEMENT, LLC f/k/a UBS
DIVERSIFIED FX MANAGEMENT,
LLC and UBS DIVERSIFIED GROWTH,
LLC,

Defendant(s),

R.J. ZAYED,

Receiver

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff(s)

Case No. 09-CV-3333 MJD/FLN

v.

TREVOR G. COOK ,
PATRICK J. KILEY,
UBS DIVERSIFIED GROWTH, LLC,
UNIVERSAL BROKERAGE FX
MANAGEMENT, LLC,
OXFORD GLOBAL ADVISORS, LLC,
and OXFORD GLOBAL PARTNERS, LLC,

Defendants,

and

BASEL GROUP, LLC
CROWN FOREX, LLC,
MARKET SHOT, LLC,
PFG COIN AND BULLION,
OXFORD DEVELOPERS, S.A.,
OXFORD FX GROWTH, L.P.,
OXFORD GLOBAL MANAGED
FUTURES FUND, L.P., UBS DIVERSIFIED
FX ADVISORS, LLC, UBS DIVERSIFIED
FX GROWTH, L.P., UBS DIVERSIFIED
FX MANAGEMENT, LLC, CLIFFORD
BERG, and ELLEN BERG,

Relief Defendants.

R.J. ZAYED,

Receiver.

TO: THE RECEIVER, AND HIS ATTORNEYS, TARA NORGARD, RUSSELL J. RIGBY AND PETER K. KOHLHEPP, CARLSON, CASPERS, VANDENBURGH & LINDQUIST, P.A., 225 S. SIXTH ST., SUITE 3200, MINNEAPOLIS, MN 55402.

MOTION

Lender Respondents move the Court as follows:

1. For an Order compelling Receiver to produce unredacted documents responsive to Lender Respondents' discovery requests regarding interview transcripts with Trevor Cook, Clifford Berg, the individual Lender Respondents, and any other witness from whom the Receiver has received testimony;
2. For an Order compelling the Mauzy firm to produce documents pursuant to the November 17, 2010 Subpoena Duces Tecum;
3. For an Order staying the proceedings in this matter until such time as Lender Respondents are afforded the opportunity to depose Clifford Berg;
4. For a Protective Order forbidding the depositions of any individual Lender Respondents until production by the Receiver of the complete, unredacted interview transcripts of the previous interviews between the Receiver and the Lender Respondent;
5. For an award of fees and costs incurred in bringing this motion; and
6. For such other and further relief as the Court may deem just and proper.

This Motion will be based on the Lender Respondents' Memorandum of Law in Support of the Motion, the Declaration of Gregory M. Erickson with attached Exhibits, and arguments of counsel. The Court is authorized to grant this relief as an exercise of its discretion as expressed in Fed. R.Civ.Pro. 37 and by applicable federal case law.

MOHRMAN & KAARDAL, P.A.

DATED: April 11, 2011

s/Gregory M. Erickson
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