

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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**RECEIVER'S MOTION TO RETAIN  
OUTSIDE COUNSEL FOR PURPOSES OF PURSUING  
CLAIMS AGAINST THIRD PARTIES**

The Receiver, R.J. Zayed, of Carlson, Caspers, Vandenburg & Lindquist, hereby respectfully moves the Court for an Order allowing the Receiver to retain outside counsel for purposes of pursuing Receivership claims against various third parties. The Receiver has identified certain outside counsel who specialize in pursuing the types of claims the Receiver seeks to bring in these matters. Due to the Receivership's finite and limited resources, the Receiver has negotiated a structure where such outside counsel would pursue these claims in exchange for a fair and reasonable contingency fee to be paid from the proceeds of a judgment or settlement. The fee that the Receiver has negotiated is not only fair and reasonable for the work that is to be done, it includes costs of the anticipated litigations. As a result of this contingent fee structure, the Receiver would gain the expertise of counsel who specialize in the claims at issue while conserving current liquid assets of the Receivership. The Receiver submits that retaining outside counsel for these claims will best serve the goals and interests of the Court's mandate because it will enable the Receiver to fully and vigilantly pursue claims against third parties without depleting the Receivership's finite and limited resources.

At the hearing, the Receiver will request proposed outside counsel to present their credentials, resources and capabilities and to answer any questions by the Court. Following these presentations, the Receiver will respectfully request the Court to grant the Receiver's motion.

Dated: September 16, 2011

Respectfully submitted,

*s/Samuel T. Lockner*

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