
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff(s)

Case No: 11-cv-00574-MJD-FLN

v.

JASON BO-ALAN BECKMAN, et al.,

**MOTION FOR LIMITED
LIFTING OF STAY TO
PETITION COURT IN
CONSIDERATION FOR
LIVING EXPENSES**

Defendant(s)

R.J. Zayed,

Receiver.

**MOTION FOR LIMITED LIFTING OF STAY TO PETITION COURT IN
CONSIDERATION FOR LIVING EXPENSES**

The Defendant, Jason Bo-Alan Beckman, respectfully moves this court, for an order granting this petition for living expense.

I. Request Allowed

The Order granting The United States Motion to Intervene and Stay Proceedings, Doc. 855, allows for “the consideration of future motions for a limited lifting of the stay in order to petition the court for attorneys’ fees, other professional fees, or living expenses, if and when such motions are made” {Civil Stay Order; Case 0:11-cv-574-MJD/FLN, Doc. 855; September 6, 2011}.

In addition, Order, No. 11-cv-574, Doc. 37, ¶ 6 (D. Minn. Apr. 1, 2011). Stipulates that the Beckman's may request living expenses beyond the 30-day original term, and they "may apply to the Court for expenses for an additional 30 days. If made, such application for extension shall contain":

- a. A full accounting of all expenditures for the original 30-day term, including supporting documentation and receipts.
- b. A complete and detailed explanation of all efforts undertaken by the Beckman's to secure employment from the date of this Order, including:
 1. a listing of all entities from which employment has been sought;
 2. a description of the type of employment sought with each entity;
 3. the name of each individual contacted at each entity in furtherance of the employment request;
 4. copies of all job applications submitted; and
 5. a detailed plan for their job searches for the 30-day extension for which living expenses are sought.

II. Request

The Defendant, Jason Beckman is requesting \$3,000 in order to provide for basic living and out of pocket Medical expenses. Pursuant to the required items stipulated above, the defendant has included, in camera review, the following:

- a. A full accounting of all expenditures for the original 30-day term, including supporting documentation and receipts (Exhibit A).
- b. A complete and detailed explanation of all efforts undertaken by the Beckman's to secure employment from the date of this Order, including: (Exhibit B)

1. a listing of all entities from which employment has been sought;
2. a description of the type of employment sought with each entity;
3. the name of each individual contacted at each entity in furtherance of the employment request;
4. copies of all job applications submitted; and
5. a detailed plan for their job searches for the 30-day extension for which living expenses are sought (Exhibit C).

Summary

The defendant has not requested additional extensions or living expenses since the original request of April 4th, 2011. In light of recent developments pertaining to the Civil Stay Order; Case 0:11-cv-574-MJD/FLN, Doc. 855; September 6, 2011; and the United States v. Jason Beckman, et al., No. 11-228(MJD/JJK) Order for Continuance, Doc. No. 129, November 2, 2011 and no current full time employment, the defendant respectfully request that this petition be granted.

November 7, 2011

s/ Jason B. Beckman

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