

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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R.J. Zayed, In His Capacity  
As Court-Appointed Receiver  
For Oxford Global Partners, LLC,  
Universal Brokerage FX, and Other  
Receiver Entities,

Plaintiff

Case No: 013-cv-1896 SRN/ SER

v.

David and Dao Allen, Judith Averett, Patricia and  
Jasper Calandra, Rose Furner, Mark Hanby, Adel  
("A.K.") Hilal, Geraldine Jackman, Norma Johnson,  
Willis Wayne King, Don and Pamela Labbee,  
Andrew Lyon, Jeffrey Lyon, Jeffrey Maki, Steven  
Perkins, Richard Plantan, Douglas Reed, David  
Sherman, John Sterback, Mark Stoltenberg, Jane  
Wamsley as trustee for the Glen Van Lehn Living  
Trust, Michael ("Bruce") Wu, Robert and Dianne  
Birk, Margaret Anderson, Mary Francoeur, George  
and Shirley Janssen, Joseph Koehnen, and Katherine  
Sobieck,

Defendants.

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**RECEIVER'S MOTION FOR SUMMARY JUDGMENT**

R.J. Zayed, Receiver, hereby moves this Court, pursuant to Federal Rule Civil Procedure 56, for summary judgment in favor of the Receiver as to Counts I and II of the Receiver's Complaint (Docket No. 1) against Defendants Adel ("A.K.") Hilal, Mark Stoltenberg, Robert and Dianne Birk, and George and Shirley Janssen (collectively "Winning Investors"), and as well as against all defenses raised by the Winning Investors in response to the Receiver's Complaint.

This motion is based on the files, records, and proceedings herein, including this Motion; the Receiver's Memorandum of Law; the Declaration of Joseph M. Kaczrowski dated April 18, 2014, and accompanying exhibits; as well as the argument of counsel at hearing and all other submissions and proceedings had in this action. A Proposed Order granting this Motion has been e-mailed to the Court's chambers.

Dated: April 18, 2014

Respectfully submitted,

*s/ Joseph M. Kaczrowski* \_\_\_\_\_

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