

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

R.J. ZAYED, In His Capacity As Court-Appointed Receiver For Oxford Global Partners, LLC, Universal Brokerage FX, and Other Receiver Entities, **Civil File No. 013-cv-1896 (DRN/SER)**

Plaintiff,)

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.

**DEFENDANT ADEL (“A.K.”) HILAL’S MEMORANDUM
IN OPPOSITION TO SUMMARY JUDGMENT**

Defendant Adel (“A.K.”) Hilal (“Mr. Hilal”) submits this memorandum in opposition to the motion for summary judgment by Receiver R.J. Zayed.

In his declaration in opposition to Receiver’s motion, Hilal raises genuine issues of fact precluding summary judgment.

Pursuant to Minn. Stat. § 513.48(a) “[a] transfer or obligation is not voidable under section 513.44(a)(1) against a person who took in good faith and for a reasonably equivalent value or against any subsequent transferee or obligee.

It is Mr. Hilal’s position the sums described in his declaration were expended in good faith and for which the Receiver received equivalent value.

For the reasons set forth by Mr. Hilal in his declaration, Receiver’s motion should be denied, because there are genuine issues of fact precluding summary judgment.

Dated: 19 May 2014

JAMES R. BEHRENBRINKER
Attorney at Law

s/ James R. Behrenbrinker

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