

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,

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.

RECEIVER'S AMENDED 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 Count II of the Receiver's Complaint (ECF No. 1) against Defendants Adel ("A.K.") Hilal, Mark Stoltenberg, and Robert and Dianne Birk (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 Receiver's original motion and supporting papers, including 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 9, 2015

Respectfully submitted,

s/ Tara C. Norgard

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capacity as court-appointed Receiver*