

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff,

Case No. 09-cv-3332 (MJD/FLN)

v.

TREVOR COOK et al.,

Defendants,

R.J. ZAYED,

Receiver.

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

Case No. 09-cv-3333 (MJD/FLN)

v.

TREVOR G. COOK et al.,

Defendants,

R.J. ZAYED,

Receiver.

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

Case No. 11-CV-574 (MJD/FLN)

v.

JASON BO-ALAN BECKMAN, et al.,

Defendants,

R.J. ZAYED,

Receiver.

**MOTION SEEKING APPROVAL OF SALE OF
THE RECEIVER'S ESTATES' CLAIM IN THE
PEREGRINE FINANCIAL GROUP, INC. BANKRUPTCY**

R.J. Zayed, in his capacity as court-appointed receiver (the “**Receiver**”) for the Estates of Trevor G. Cook, Patrick J. Kiley, Jason Bo-Alan Beckman, UBS Diversified Growth, LLC, Market Shot, LLC, Oxford Global Advisors, LLC, Oxford Global Partners, LLC, Oxford Global FX, LLC, Oxford Growth FX L.P., and various other individuals and entities controlled by them (the “**Receiver Estates**”), seeks approval by this Court of the sale of the Receiver Estates’ Claim in the Peregrine Financial Group, Inc. bankruptcy (Bankr. N.D. Ill. 12-27488) to the highest bidder at the public auction held on September 16, 2014 at the office of Reid Collins & Tsai LLP, One Penn Plaza, 49th Floor, New York, NY 10119: Tangerine Funding, LLC. This Motion is based on (i) the Notice of Hearing submitted herewith, (ii) the Declaration of Angela J. Somers, Esq., and the exhibits thereto, submitted herewith, (iii) the Proposed Order submitted herewith, (iv) the pleadings and papers on file in this action, and (v) such other evidence and argument as may be presented to the Court before or at the time of the hearing.

Dated: October 1, 2014

Respectfully submitted,

R.J. ZAYED, IN HIS CAPACITY AS
RECEIVER,

By his attorneys,

s/ Tara C. Norgard

Tara C. Norgard (MN Bar No. 307,683)
Samuel T. Lockner (MN Bar No. 341,095)
CARLSON, CASPERS,
VANDENBURGH, LINDQUIST &
SCHUMAN
225 S. 6th Street, Suite 4200
Minneapolis, MN 55402

612-436-9600
612-436-9605 (fax)
tnorgard@carlsoncaspers.com
slockner@carlsoncaspers.com

Special Litigation Counsel to the Receiver

REID COLLINS & TSAI LLP
William T. Reid, IV, Esq.
Rachel S. Fleishman, Esq.
Angela J. Somers, Esq.
Anne M. Bahr, Esq.
One Penn Plaza, 49th Floor
New York, NY 10119
212-334-5000
212-334-5299 (fax)
wreid@rctlegal.com
rfleishman@rctlegal.com
asomers@rctlegal.com
abahr@rctlegal.com