

1. all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose, at any trial or hearing in this case or in any related or subsequent action or proceeding, if any, of any of the documents produced hereunder or the subject matter thereof;
2. the right to object on any ground to the use of documents produced hereunder or the subject matter thereof, at any trial or hearing in this case or in any related or subsequent action or proceeding;
3. the right to object on any ground at any time to a demand for further responses or document production; and
4. the right at any time to revise, supplement, correct, or add to this response.

Dubin will limit its production subject to and without waiver of the general and specific objections set forth herein.

GENERAL RESPONSES AND OBJECTIONS

In addition to the specific grounds for objection set forth below (the “Specific Responses and Objections”), Dubin responds and objects generally with respect to each and every request as follows (the “General Responses and Objections”):

1. Dubin objects to the Subpoena on the grounds that counsel serving the subpoena lacks the authority to propound it and the arbitrator lacks authority to order compliance with it. Dubin’s decision to produce documents in response to the Subpoena to the parties does not waive Dubin’s objection to the Subpoena on these grounds. By responding to this Subpoena, Dubin assumes no obligation to supplement its responses or to respond to any subsequent third-party subpoenas.