

4. Dubin objects to the definition of “Document” as vague, overbroad and unduly burdensome.

5. Dubin objects to the definition of “Person” on the ground that it is vague, overbroad and unduly burdensome.

6. Dubin objects to the definition of “All” and “each” as vague, overbroad and unduly burdensome.

### **Objections to Instructions**

1. Dubin objects to each of the Instructions to the extent that they purport to impose any obligations that exceed the requirements of the New York Civil Practice Law and Rules, the Federal Rules of Civil Procedure, the JAMS Comprehensive Arbitration Rules and Procedures, or any other applicable statute, rule or case law. Dubin also objects to the Instructions to the extent that they impose an undue burden on a non-party to the arbitration.

2. Dubin objects to Instruction 2 on the ground that it places an undue burden on a non-party. Dubin will not produce the information requested in Instruction 2.

### **SPECIFIC RESPONSES AND OBJECTIONS**

**Request No. 1:** All documents concerning any communication between You on the one hand, and any of the Zwirn Parties on the other, concerning any of the Third-Party Claimants.

#### **Response to Request No. 1:**

Dubin objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is irrelevant and not calculated to lead to the discovery of admissible evidence. Subject to and without waiving its General Objections