

and these objections, Dubin will undertake a reasonable search for and produce documents relating to the Fund or Third-Party Claimants' investments in the Fund.

Request No. 2: All documents concerning any communication between You on the one hand, and any of the Third-Party Claimants on the other, concerning any of the Zwirn Parties, the Claimants or the Fund.

Response to Request No. 2:

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 and these objections, Dubin will undertake a reasonable search for and produce documents relating to the Fund or Third-Party Claimants' investments in the Fund.

Request No. 3: All documents concerning any potential or actual investment in the Fund by any of the Third-Party Claimants.

Response to Request No. 3:

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. Dubin further objects because it seeks information more easily available from the parties. Subject to and without waiving its General Objections and these objections, Dubin will undertake a reasonable search for and produce responsive documents.

Request No. 4: All documents concerning the alleged conversations described in ¶¶ 6, 7 and 8 of the Affidavit.

Response to Request No. 4:

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