

designations. Claimants may call the following witnesses during arbitration to offer evidence in support of their claims and defenses:

Daniel Zwirn;

Jeffrey Epstein;

David Lee;

Doug Cardoni;

Elise Hubsher;

Brad Flood;

Allyson Alimansky; and

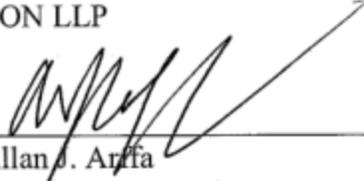
Heath Weisberg.

Henry Bregstein of Katten Muchin Rosenman LLP may testify as an expert on the practices relating to restrictions on investment withdrawals (and the reasons for such practices) in the hedge fund industry.

Claimants reserve the right not to call the above witnesses. Claimants further reserve their right to call additional witnesses for the purpose of rebuttal or impeachment, and any witness called by any other party in this arbitration. Claimants also reserve the right to call custodians of records solely for the purpose of establishing the foundation facts necessary to admit into evidence any document whose admissibility into evidence any other party objects to. Claimants further reserve the right to supplement their witness list to the extent additional witnesses are identified.

Dated: May 20, 2011
New York, NY

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP



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