

- Documents of Zwirn communications related to FTC's/JEEPERS' redemption rights and/or efforts to redeem, including any related to Zwirn's request for JEE not to make a full redemption and Zwirn's agreement to redeem \$80MM;
- Any documents concerning the various irregularities in Zwirn's management and record-keeping with respect to the Funds and related Zwirn entities;
- Documents relating to the structure of Zwirn's and Zwirn entities' ownership, administration and management of the Funds and how that changed during the life of the Funds;
- Documents relating to redemptions, distributions and other payments made by the Zwirn Funds from 2006 forward;
- A copy of Zwirn's 2004 "wind-down" agreement and documents indicating payments made under that agreement;