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December 5, 2006

**FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83**

By Hand Delivery

Robert H. Murphy, Esq.
Branch Chief, Enforcement Branch 13
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Mr. Murphy:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 21, 2006 confidentiality letter between the Staff and DBZ, and in response to your oral request on November 28, 2006, we are voluntarily producing a Key Documents Binder (with indices), which contains selected documents DBZ produced to the Staff on November 28 (Bates-stamped DBZ 0000036 - ~~DBZ 0008242~~). The index of key documents relating to [redacted] fees is Bates-stamped DBZ 0008271 - DBZ 0008274. The index of key documents relating to airplane expenses is Bates-stamped DBZ 0008273 - DBZ 0008274.

These are additional index docs. ~~be~~ please pull & send to me.

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0008275

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December 5, 2006

**FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83**

By Hand Delivery

Robert H. Murphy, Esq.
Branch Chief, Enforcement Branch 13
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Mr. Murphy:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a Bates-stamped version of the binder of documents used in Gibson, Dunn & Crutcher's presentation to the Staff on December 1, 2006 (Bates-stamped DBZ 0008277 - DBZ 0008368). It is our understanding that upon receipt of this binder the Staff will either return to us, or destroy, any existing un-bates versions of this binder it has in its possession.

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If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0008369

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January 9, 2007

FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83

By Hand Delivery

Robert H. Murphy, Esq.
Branch Chief, Enforcement Branch 13
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Mr. Murphy:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a binder of documents used in connection with Gibson, Dunn & Crutcher's presentation to the Staff on January 9, 2007 (Bates-stamped DBZ 0008373 - DBZ 0008536). P 11

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

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On behalf of our client, we hereby claim that all materials provided to the Staff during the course of its investigation, including this letter (Bates-stamped DBZ 0008537 - DBZ 0008538),

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0008537

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January 11, 2007

FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83

By Hand Delivery

Kay L. Lackey, Assistant Regional Director
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Ms. Lackey:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a copy of both the PowerPoint slides and the handout used in connection with Gibson, Dunn & Crutcher's presentation to the Staff on January 9, 2007 (Bates-stamped DBZ.0008539 - DBZ.0008626). Minor, non-substantive changes have been made to the PowerPoint slides for clarity and readability.

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0008627

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February 7, 2007

**FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83**

By Hand Delivery

Kay L. Lackey, Assistant Regional Director
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Ms. Lackey:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, and in response to your oral request on February 7, 2007, we are voluntarily producing the enclosed DBZ Memorandum to Investors dated January 29, 2007 (Bates-stamped DBZ 0008856 – DBZ 0008869).

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

On behalf of our client, we hereby claim that all materials provided to the Staff during the course of its investigation, including this letter (Bates-stamped DBZ 0008870 – DBZ 0008871) the materials accompanying this letter (Bates-stamped DBZ 0008856 – DBZ 0008869), all documents produced, and all testimony provided by our client, are entitled to confidential treatment pursuant to the Freedom of Information Act. Each document has been appropriately

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0008870

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March 20, 2007

FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83

By Hand Delivery

Kay L. Lackey, Esq.
Assistant Regional Director
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Ms. Lackey:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a binder of documents used in Gibson, Dunn & Crutcher's presentation to the Staff on March 20, 2007 (Bates-stamped DBZ 0008872 - DBZ 0009082).

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

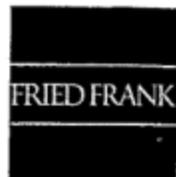
On behalf of our client, we hereby claim that all materials provided to the Staff during the course of its investigation, including this letter (Bates-stamped DBZ 0009083 - DBZ 0009084),

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0009083

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March 21, 2007

**FOIA CONFIDENTIAL TREATMENT CLAIM
CONFIDENTIAL PURSUANT TO
17 CFR § 200.83**

By Hand Delivery

Kay L. Lackey, Assistant Regional Director
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Ms. Lackey:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a copy of the PowerPoint slides used in connection with Gibson, Dunn & Crutcher's presentation to the Staff on March 20, 2007 (Bates-stamped DBZ 0009087 - DBZ 0009214).

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

On behalf of our client, we hereby claim that all materials provided to the Staff during the course of its investigation, including this letter (Bates-stamped DBZ 0009215 - DBZ 0009216), the materials accompanying this letter (Bates-stamped DBZ 0009087 - DBZ 0009214), all

Confidential Treatment Requested

by Fried Frank Harris Shriver & Jacobson LLP

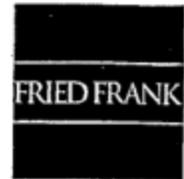
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DBZ 0009215

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March 20, 2007

**FOIA CONFIDENTIAL TREATMENT CLAIM
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By Hand Delivery

Kay L. Lackey, Esq.
Assistant Regional Director
Northeast Regional Office
United States Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Re: D.B. Zwirn & Co., L.P.

Dear Ms. Lackey:

On behalf of our client, D.B. Zwirn & Co., L.P. ("DBZ"), pursuant to the November 14 and 21, 2006 confidentiality letters between the Staff and DBZ, we are voluntarily producing a binder of documents used in Gibson, Dunn & Crutcher's presentation to the Staff on March 20, 2007 (Bates-stamped DBZ 0008872 - DBZ 0009082).

If you have any questions or concerns with regard to these materials, please do not hesitate to contact me.

* * *

This production is not intended to, and does not, waive any applicable privilege or protection, including the attorney-client privilege or work product protection. If any information that would be protected by the attorney-client privilege or work product doctrine was produced, such production was inadvertent and was not intended to be a waiver of any applicable privilege or protection and we respectfully request the return of such privileged material.

On behalf of our client, we hereby claim that all materials provided to the Staff during the course of its investigation, including this letter (Bates-stamped DBZ 0009083 - DBZ 0009084),

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0009083

Kay L. Lackey, Esq.

Offering Memoranda/ Investment Advisory Agreements	Bates Range	Page(s) Describing the Investment Allocation Policy
✓ Highbridge/Zwirn Special Opportunities Fund, L.P., April 2002	DBZ 0009444 – DBZ 0009525	DBZ 0009473
✓ Highbridge/Zwirn Special Opportunities Fund, L.P., May 2003	DBZ 0009526 – DBZ 0009579	DBZ 0009560 – DBZ 0009561
✓ D.B. Zwirn Special Opportunities Fund, L.P., May 2005	DBZ 0009580 – DBZ 0009674	DBZ 0009633 – DBZ 0009633
Highbridge/Zwirn Special Opportunities Fund, LTD., April 2002	DBZ 0009675 – DBZ 0009741	DBZ 0009704
Highbridge/Zwirn Special Opportunities Fund, LTD., July 2003	DBZ 0009742 – DBZ 0009816	DBZ 0009777
D.B. Zwirn Special Opportunities Fund, LTD., July 2005	DBZ 0009817 – DBZ 0009933	DBZ 0009876 – DBZ 0009877
Highbridge/Zwirn Special Opportunities Fund (TE), L.P., May 2003	DBZ 0009934 – DBZ 0009995	DBZ 0009971
D.B. Zwirn Special Opportunities Fund (TE), L.P., June 2005	DBZ 0009996 – DBZ 0010088	DBZ 0010048 – DBZ 0010049
D.B. Zwirn Special Opportunities Fund II, LTD., August 2005	DBZ 0010089 – DBZ 0010202	DBZ 0010149
D.B. Zwirn Asia/Pacific Special Opportunities Fund, L.P., October 2006	DBZ 0010203 – DBZ 0010308	DBZ 0010265
Jerome Investments LLC, September 1, 2002	DBZ 0010309 – DBZ 0010329	DBZ 0010311
Randle Investments LLC, September 1, 2002	DBZ 0010330 – DBZ 0010350	DBZ 0010332
HCM/Z Special Opportunities LLC, January 1, 2004	DBZ 0010351 – DBZ 0010363	DBZ 0010352 – DBZ 0010353; DBZ 0010359
Delphi Financial Group, Inc., March 30, 2004	DBZ 0010364 – DBZ 0010386	DBZ 0010365; DBZ 0010379

Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0010620

Kay L. Lackey, Esq.

Offering Memoranda/ Investment Advisory Agreements	Bates Range	Page(s) Describing the Investment Allocation Policy
Safety National Casualty Corporation, March 30, 2004	DBZ 0010387 – DBZ 0010412	DBZ 0010388; DBZ 0010405
Reliance Standard Life Insurance Company, March 30, 2004	DBZ 0010143 – DBZ 0010437	DBZ 0010414; DBZ 0010429
The Coast Fund, L.P., September 30, 2005	DBZ 0010438 – DBZ 0010457	DBZ 0010439 – DBZ 0010440; DBZ 0010453

In the event we locate additional documents for the period covered by the subpoena that set forth DBZ's investment allocation policy we will promptly produce them.

Client List

The document Bates-stamped DBZ 0010458 is a list of DBZ's current and former clients, including managed accounts, for the period covered by the subpoena. DBZ created this list in response to Request 13 of the subpoena. As we discussed during our telephone call on April 23, 2007, this list does not include subsidiaries or affiliates of DBZ's clients.

Watch List Reports

The documents Bates-stamped DBZ 0010459 – DBZ 0010618 are Watch List reports for the period of April 2005 through October 2006; Watch List reports were not created prior to April 2005. We are producing these documents in response to Request 25 of the subpoena. Watch Lists are created on an almost weekly basis by DBZ Asset Management, which is known as DBZ Global Advisors. The Watch List tracks the risk levels of illiquid investments and provides information on value reductions taken on the investments, by specific investment. As we discussed during our telephone call on April 23, 2007, "Reserves" as traditionally defined, are not taken by the Funds with respect to investments at DBZ (i.e., cash pools set aside by Fund to account for problematic assets). Rather, DBZ reflects a "reserve" as part of the pricing process by reducing the value of the asset on its books.

If you have any questions regarding these materials, please do not hesitate to contact me.

* * *

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Confidential Treatment Requested
by Fried Frank Harris Shriver & Jacobson LLP

DBZ 0010621