

Topics for Document Requests

Accounting Irregularities

1. Report of Independent Review
2. Docs relating to Report of Independent Review
3. Docs produced, reviewed, created in connection with the internal investigation
4. Witness statements from investigation
5. Docs concerning the SEC, including docs produced to the SEC and docs received from the SEC
6. SEC subpoenas
7. Testimony given to SEC
8. Docs and testimony given to any other agency or regulatory body
9. Docs concerning termination of CFO and CFO litigation
10. Other employee litigation

Fortress

1. Due diligence re: Fund
2. Review, analysis of redemption claims and exposure
3. Docs concerning FTC claims
4. Indemnity Agreement w/ DZ
5. Joint Defense/Common Interest Agreement w/DZ
6. Information Sharing Agreement
7. Inventories, indices, summaries of docs held by third-party vendor
8. Litigations, arbitrations with investors (pleadings, discovery, settlements, etc.)
9. Redemption requests by others

10. Filings with SEC or other agencies

Fund Documents

1. Reports and communications with investors and FTC
2. Valuations, both internal and provided to investors
3. Account statements
4. LPAs and amendments; drafts
5. Subscription docs
6. Offering Memoranda
7. SEC filings or other agency filings
8. Communications, meetings with Dubin and/or Zwirn re FTC's initial investment and subsequent investments

FTC Redemption

1. All docs re FTC redemption requests
2. Emails, notes, memos, telephone records
3. Internal memos and discussions
4. Analyses of FTC requests
5. Communications with others, incl. Glenn Dubin

Other

1. List of all docs withheld as privileged
2. Docs concerning Dubin withdrawal of funds under management