

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17342

In the Matter of

RD LEGAL CAPITAL, LLC and
RONI DERSOVITZ,

Respondents.

DIVISION OF ENFORCEMENT'S MEMORANDUM OF LAW IN SUPPORT OF ITS
OMNIBUS MOTION *IN LIMINE* TO PRECLUDE
CERTAIN TESTIMONIAL AND DOCUMENTARY EVIDENCE

Dated: March 8, 2017

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PRELIMINARY STATEMENT

The Division of Enforcement (“Division”) respectfully submits this Omnibus Motion in Limine to preclude Respondents from offering unduly duplicative, irrelevant, or unreliable documentary evidence, and to preclude irrelevant, immaterial, or unreliable testimony.

Five months ago, this Court ordered the parties to exchange witness and exhibit lists, as well as pre-marked exhibits, on March 1, 2017. See Scheduling Order, Rel. No. 4237 (Oct. 7, 2016). Respondents provided a draft of their list to the Division on March 1, with new iterations coming on March 5 and late yesterday, and only began producing their marked exhibits to the Division on March 5, with new documents trickling in ever since. Respondents’ latest list of nearly 1,500 documents (three times the size of the Division’s list) is littered with duplicative entries and irrelevant and unreliable documents plainly meant to defer until later decisions about what exhibits to use at the hearing, to distract from the issues in dispute in this matter, or both.

In the face of Respondents’ moving target exhibit list, the Division objects to the admission of documents that (1) purport to show the contents of Respondents’ website, as well as witness testimony to that effect, as irrelevant and unreliable; (2) are irrelevant and immaterial to the legal issues in this proceeding (e.g., documents addressing the due diligence Respondents’ investors could have conducted; documents that purport to show secondary collateral for certain investments; and documents about the day-to-day administration of the funds); (3) contain unreliable hearsay, such as sworn statements, certain emails, and audit and valuation reports; and (4) are unreliable because they are redacted, incomplete, or of an unknown origin or destination.

Respondents’ witness list suffers from similar defects. It purports to offer the testimony of two individuals—Brett Fields and Kyle Vataha—that have no relevant or reliable testimony to offer and to which the Division accordingly objects. The Division also objects to the testimony of

Respondents' experts to the extent they opine as to the ultimate issue to be tried in this case, and to the testimony of any lay or fact witnesses improperly couched as the testimony of an expert.

Respondents' exhibit and witness lists provide insight into why their counsel suggested, at the initial pre-hearing conference, that Respondents' defense may take as long or longer to present than the Division's case. Respondents want to focus on matters unrelated to the relevant issues, which are what Respondents' actually represented to investors, the reasons those statements and omissions are material, false and otherwise misleading, and the evidence of Respondents' scienter. The Division urges the Court to limit the hearing to those witnesses and documents relevant to Respondents' liability for their fraud.

ARGUMENT

Under Rule 320 of the Commission's Rules of Practice, "the hearing officer . . . shall exclude all evidence that is irrelevant, immaterial, unduly repetitious, or unreliable." 17 C.F.R. § 201.320(a) (emphasis added). The Division objects to the introduction of evidence at trial—documentary or testimonial—that does not meet the standards of relevance, materiality, repetitiveness, or reliability set forth by the Rule.

I. Respondents Should Be Precluded from Offering Irrelevant, Immaterial, or Unreliable Documentary Evidence

As a threshold matter, the Division objects to Respondents' exhibit list as a whole as unduly repetitious. If Respondents included the same documents more than once to use each for a different purpose, they should make an offer of proof as to how they intend to use their many seemingly identical documents.¹ In a matter where the Division bears the burden of proof on most

¹ See, e.g., Resp. Exs. 1051 and 1052, 1054 and 1055, 1144 and 1145, 1231 and 1232, 1298 and 1299, 1365 and 1366, 1456 and 1457, 1829 and 1830, 1838 and 1839, 1882 and 1886, 2104 and 2105, 2117 through 2121, 2125 and 2126, 2182 and 2183 & 2286 and 2287. The Division's complete objections to Respondents' Exhibits are noted in Exhibit A hereto. The Division hereby repeats the objections noted in Exhibit A with respect to any document that may be duplicated

issues, the Division submitted an exhibit list less than one-third the size of Respondents', rather than bloat the record with documents with little or no connection to the issues to be tried simply because they bear a proposed witness's name. To facilitate an efficient hearing, and avoid trial by surprise, Respondents' should do the same. The Division further objects to the introduction of certain specific exhibits that are irrelevant, immaterial, and/or unreliable, as set forth below.

A. Documents Relating to Materials on Respondents' Website Are Irrelevant, Immaterial, and Unreliable

At various points in these proceedings, Respondents have advanced that certain information about the two funds at issue (the "Funds") was available on Respondents' website. Their exhibit list now contains certain documents that purport to indicate that certain materials were on that website, but all such documents contain a fatal defect: at most, they purport to show the contents of the website as of November 2016,² a date after the filing of the Order Instituting Proceedings in this matter, let alone any offer or sale the Division alleges was fraudulent. Respondents should be precluded from adducing evidence of what documents were available through their website absent reliable evidence of what was available at the times of the misrepresentations alleged in the OIP, not as of November 2016.³

B. Documents Irrelevant to the Issues to Be Tried Are Inadmissible

Documents About Potential Investor Due Diligence. As stated more fully in the Division's prehearing brief, this case is about Respondents' actions, not what Respondents believe their

elsewhere in Respondents' exhibit list, including but not limited to as attachments within other exhibits.

² See, e.g., Resp. Exs. 2342-2353 (website collection reports time-stamped as of November 2016).

³ In addition to the documents identified supra at note 2, the Division objects to Respondents' Exhibits 2341, and 2354 through 2364, and to the testimony of Allen Hakim and the "Foundation Witness" from "PageFreezer Software, Inc.," on the same bases.

investors should have done. Unlike in private securities cases, the due diligence Respondents believe investors could, or should, have conducted is not relevant. See generally Division of Enforcement's Prehearing Brief at 27-28.

Respondents' proposed exhibit list demonstrates that Respondents intend to stage a sideshow by introducing documents that were not routinely (if ever) provided to potential (as opposed to existing) investors. To the extent Respondents simply wish to demonstrate—and can demonstrate—that certain information was available to investors, the Division does not object to the introduction of such exhibits. The Division objects, however, to the admission of Fund documents—from those purportedly available to investors who searched Respondents' website, to other standalone exhibits such as financial statements and quarterly audit reports—to support a “blame-the-investors” defense not available to Respondents in this proceeding.⁴

Evidence Regarding Secondary Collateral for the Funds' Investments. The Division alleges that Respondents told investors that the Funds were investing in one type of legal fees—associated with cases that were settled or otherwise past the point of disputes—when they were in fact investing in not settled or otherwise finalized cases. That Respondents may have had other sources from which they hoped to collect on the monies they advanced with respect to these matters is not relevant to questions at the heart of this case: whether Respondents knowingly told investors they were investing in resolved cases while actually investing in unresolved matters. Accordingly, the Division moves to preclude the admission of documents that purport to show secondary collateral Respondents hoped to attain if the attorneys they funded lost their underlying

⁴ See, e.g., Resp. Exs. 1018; 1025-26; 1028-30; 1034, 1038; 1048, 1056; 1058-60; 1064-64; 1073; 1083; 1091-92; 1095-96; 1103-05; 1117; 1129; 1132; 1139; 1141-42; 1151; 1192; 1243; 1246; 1285-86; 1290-93; 1348-49; 1423; 1425; 1428; 1494; 1496; 1548-52; 1560-62; 1658-59; 1661; 1718; 1723; 1795; 1817; 1822; 1826; 1877-79; 1884-85; 1943; 1945; 2011; 2046; 2049; 2078; 2080; 2086; 2089; 2092; 2148-49; 2259; 2262 & 2417; see also supra nn. 2 & 3.

cases, including guaranties or audit reports regarding these attorneys' inventories, as immaterial and irrelevant.⁵

Evidence About the Administration of Respondents' Funds. Respondents' exhibit list contains numerous documents that relate to the administration of their two funds.⁶ Moreover, one of Respondents' proposed experts, David X. Martin, spends much of his report opining that "RD Legal's Portfolio Risk Management Processes Were Performed According to Industry Standards," Resp. Ex. 2393 at ¶¶ 70-74, and Respondents propose to offer the testimony of Frank Franiak to discuss "the services Woodfield provides to the funds under its services agreement." This evidence is immaterial and irrelevant to the issues to be tried, which center on statements Respondents made to investors, not on how their Funds were administrated. Again, there is no reason to extend an already-lengthening proceeding with irrelevant evidence and testimony.

C. Prior Sworn Statements and Unreliable Hearsay Are Inadmissible

Prior Sworn Statements. Respondents should not be permitted to introduce the sworn declaration of non-party witness Ned Doubleday, Resp. Ex. 2322, or of testimony provided in an Italian Court, Resp. Ex. 2487. Rule 235(a) speaks specifically to when a party may introduce a sworn statement from individuals who are not adverse, permitting a person wishing to offer such statement to "make a motion setting forth the reasons therefor." 17 C.F.R. § 201.235(a) (emphasis added). Respondents have made no such motion for Mr. Doubleday or the foreign testimony. Furthermore, as the Court may recall, at the August 22, 2016 Initial Prehearing Conference, Respondents specifically objected to the use of prior sworn statements, arguing that it is "really important" to have the opportunity to cross-examine witnesses. Ex. B (Aug. 22, 2016 Prehearing

⁵ See, e.g., Resp. Exs. 1044; 1111; 1112; 1159; 1161; 1416; 1417; 1419; 1420 & 2415 (attorney guaranties); id. 2099; 2246; 2256; 2253 & 2268 (other audits).

⁶ E.g., id. 1074; 2242 & 2243.

Conf. Tr.) at 20. Accordingly, the Division did not include any declarations on its exhibit list (including only those transcripts of adverse party witnesses as defined and permitted explicitly by Rule 235(b)). As Respondents cannot offer any reason why Rule 235 should not apply to them, they should not be permitted to offer Exhibits 2322 or 2487 as evidence.

Documents that Contain Facially Unreliable Hearsay. In their proposed exhibit list, Respondents offer documents that contain hearsay, including emails and notes, for which no witness is currently slated to testify at trial. For example, Respondents purport to offer emails between Nate Anderson and other individuals, as well as Mr. Anderson's and others' notes.⁷

The Division objects to the introduction of these documents as containing unreliable hearsay. Under Rule 320(b), hearsay evidence may be admitted "if it is relevant, material, and bears satisfactory indicia of reliability so that its use is fair." 17 C.F.R. § 201.320(b). In adopting the rule, the Commission explained that a "case-by-case determination of the admissibility of hearsay evidence is more appropriate" and that this analysis turned in part on the availability and credibility of the declarant, as well as his or her motives or potential biases, and whether those statements are contradicted or consistent with direct testimony. Adopting Release for Amended Rules of Practice, Rel. No. 34-78319 at *63-64 (July 13, 2016) ("Adopting Release"); see also In re Abbondante, Rel. No. 34-53066, 2006 WL 42393, at *8 (S.E.C. Jan. 6, 2006).

⁷ See, e.g., Resp. Ex. 1947; 1950; 2100; 2101; 2147 & 2247 (communications between Nate Anderson and others not slated to testify); id. 2130 & 2436 (notes of unknown provenance); id. 2044 (communication between individuals not on witness lists).

The out of court statements of Mr. Anderson (an individual within this Court's subpoena jurisdiction, and who was identified as a whistleblower and later deposed in this action), and of any other available individuals not slated for testimony, are unreliable and should be precluded.⁸

Documents that May Contain Unreliable Hearsay Depending on their Purpose. The Division similarly objects to other documents that could constitute unreliable hearsay, depending on the purpose for which they are offered. For example, Respondents' exhibit list contains valuation reports by its agent, Pluris Valuation, numerous audit reports conducted by the law firm of Smith Mazure, and other audit reports.⁹ To the extent Respondents wish to offer these documents for the truth of the matter asserted in them—*i.e.*, to prove the actual value of the Funds' assets or the contents of an audit report—the Division objects to their use as unreliable hearsay. The Division submits that the Court should reserve consideration of these documents' admissibility until hearing from the declarants relevant to each document so that it can make an informed, case-by-case determination as to purpose for which such documents might be admitted, and the reliability of any hearsay contained therein.¹⁰

⁸ The Division has not noted objections to Respondents' exhibits evidencing communications involving at least one individual slated to testify. The Division reserves the right to object to the admission of such documents should Respondents fail to call the individuals related to such communications or otherwise offer evidence regarding the reliability of such hearsay.

⁹ See, e.g., Resp. Exs. 1188; 1208; 1224; 1241; 1249; 1267; 1284; 1307; 1325; 1344; 1371; 1401; 1422; 1439; 1472; 1493; 1507; 1526; 1547; 1599; 1637; 1638; 1655; 1686; 1703; 1716; 1748; 1750; 1773; 1816; 1819; 1847; 1848; 1868; 1876; 1897; 1898; 1914; 1942; 1964; 1965; 1987; 2008; 2028; 2040; 2045; 2047; 2057; 2068; 2079; 2096; 2108; 2127; 2137; 2128; 2189; 2203; 2213; 2225; 2235; 2244; 2256; 2258; 2278; 2291; 2301; 2307; 2312; 2319; 2324; 2328 & 2236 (Pluris valuation reports); *id.* 1064; 1065; 1104; 1137; 1301; 1743; 2004 & 2072 (certain Smith Mazure audits); *id.* 2099; 2246; 2256; 2253; 2268; 2476-2485 (other audits); see also *infra* n.11 (listing quarterly audit reports by Wiss & Co.).

¹⁰ In addition, to the extent these documents relate to Respondents' improper "reliance on the advice of counsel and other professionals" defense with respect to Offering and Marketing Materials, the Division objects to their admissibility for the reasons set forth in the Division's

D. Redacted or Incomplete Documents Are Unreliable

Redacted Documents. The Division objects to documents that contain unnecessary redactions, because the reliability of those documents cannot be ascertained without their complete and unaltered versions.¹¹ To the extent redactions are to protect personal information or information over which Respondents are claiming privilege, they should be marked accordingly.

Respondent Roni Dersovitz's Incomplete Tax Returns. The Division objects to the introduction of incomplete, and therefore unreliable, evidence of Respondents' financial condition such as Respondent Roni Dersovitz's tax returns. The Division further objects to these materials given that Respondents have refused to provide documents germane to any potential inability to pay defense, urging the Court to defer "discovery into Respondents' financial condition . . . until such time as it may be needed." Ex. C (Letter from T. Healy to Hon. Carol Fox Foelak dated Sept. 30, 2016) at 5.¹² If Respondents intend to adduce evidence demonstrating their claimed inability to pay disgorgement or penalties in this matter, a complete disclosure of such information is needed.

Documents of Unknown Provenance or with Unknown Recipients. Respondents' exhibit list is also littered with a litany of documents that are not self-authenticating (such as documents purporting to show the Funds' financial conditions, statements of withdrawals of assets from the Funds, and statements of the Funds' claimed expenses), or that are otherwise incomplete because

motion to preclude such defense, submitted concurrently herewith. In their objections to Respondents' Exhibit List, the Division has not now noted its objections to any document that could be offered to advance such improper defense, but reserves the right to oppose their admission to further that defense pending the resolution of the Division's motion to preclude that defense.

¹¹ See, e.g., Resp. Exs. 1025-26; 1028-30; 1034; 1048; 1058; 1064-65; 1073; 1083; 1103; 1117; 1151; 1192; 1240; 1243; 1249; 1349; 1425; 1494; 1496; 1659; 1661; 1718; 1723; 1795; 1822; 1826 & 1943 (audit reports with redactions); see also id. 2320 & 2417 (other redacted documents).

¹² See, e.g., id. 1294; 1563; 1887; 2090; 2264 & 2470. The Division also objects to any other incomplete documents as unreliable, such as Respondents' Exhibits 2155 and 2264.

they do not show a list of recipients. Absent evidence relating to the creation of these documents, to the source of the information contained therein, or to the fact that such documents were delivered to any relevant party, the Division objects to their admission as unreliable.¹³

II. Respondents Should Be Precluded from Offering the Testimony of Irrelevant, Immaterial, or Unreliable Witnesses

The Division also objects to the introduction of testimonial evidence, in whole or in part, from certain witnesses as irrelevant, immaterial, or unreliable, as set forth below.

Expert Opinions on the Ultimate Issue of Liability. The proposed expert report of David X. Martin is replete with impermissible and unreliable opinions about the ultimate issue for this Court as trier of fact to determine in this case—whether Respondents’ statements to investors violated the antifraud provisions of the securities laws. For example, Mr. Martin states that “it is [his] opinion that the SEC’s allegation that RD Legal was misrepresenting the type of assets it was purchasing is plainly not correct from an investor perspective.” See Resp. Ex. 2393 at ¶ 12; see also id. at ¶ 20. Similarly, the expert report of Leon Metzger states that “[i]n [his] opinion, the SEC’s allegations fail to show that RDLC made any materially false statement or omission in connection with the sale of partnership interests in the Funds.” Resp. Ex. 2396 at ¶ 58; see also id. at ¶¶ 72-73, 143.

Expert “opinions” as to the ultimate issue are unreliable, and Messrs. Martin and Metzger should not be permitted to offer them. It is the province of this Court, as fact-finder and based on the totality of the evidence adduced at trial (and not based on Respondents’ self-serving presentation), to determine whether Respondents violated the antifraud provisions of the securities laws. Cf. Marx & Co., Inc. v. Diner’s Club, Inc., 550 F.2d 505, 512 (2d Cir. 1977) (“experience is

¹³ See, e.g., id. 1003; 1104; 1118; 1287; 1545; 1554; 1874; 1880; 1967; 2077; 2082; 2093; 2238; 2253; 2255; 2257; 2272; 2275; 2308; 2337; 2341; 2342; 2343; 2344; 2345; 2346; 2347; 2348; 2349; 2350; 2351; 2352; 2353; 2354; 2355; 2356; 2357; 2358; 2359; 2360; 2361; 2362; 2363; 2364; 2377; 2378; 2379; 2380; 2422; 2423; 2425; 2444 & 2446 (documents of unknown provenance or for which the backup information is unknown); id. 1128; 1186; 1246; 1261; 4262; 1263; 1369; 1370; 1383; 1431; 1432; 1490; 1491 & 1544 (documents with unknown recipients).

hardly a qualification for construing a document for its legal effect when there is a knowledgeable gentleman in a robe” able to instruct the jury on the law).

Lay Witnesses Purporting to Provide Expert Testimony. In their preliminary list of potential expert witnesses, Respondents listed twenty individuals as “Witnesses Who Have Not Been Retained Or Specially Employed To Provide Testimony In This Matter But Who May Testify At The Hearing In The Form Of Opinion Based On Scientific, Technical, Or Specialized Knowledge.” See Ex. D (First Amended List of Potential Expert Witnesses of Respondents) at 2-3. Seventeen of those individuals reappear on Respondents’ Final Witness List.¹⁴

But Rule 222(b) requires that any party intending to call a witness as an expert submit, inter alia, a statement of the expert’s qualifications and a list of publications and other expert testimony provided by the witness. 17 C.F.R. § 201.222(b). In adopting this rule, the Commission explicitly noted that it “require[s] parties to a proceeding who intend to call expert witnesses to submit information about these expert witnesses.” Adopting Release at *85 (July 13, 2016).

None of the foregoing seventeen witnesses have been submitted as an expert and Respondents have not complied with Rule 222(b)’s expert disclosure requirements, as mandated by this Court’s scheduling order, with respect to any of them.¹⁵ Accordingly, none should be permitted to testify in this capacity. See United States v. Cruz, 981 F.2d 659, 664 (2d. Cir. 1992)

¹⁴ The witnesses are David Backens, Todd Dawes, Roni Dersovitz, Frank Faniak, Scott Gottlieb, Amy Hirsch, Travis Hutchinson, Thomas Lowe, Katarina Markovic, James C. Martin, Daniel Osborn, Espen Robak, Dennis Schall, Joel M. Simon, Corey A. Tavel, Kyle Vataha, and Leo Zatta.

¹⁵ In their exhibit list, Respondents include the resume and speaking engagements of lay witness Amy Hirsch. See Resp. Exs. 2320 & 2421. These exhibits, provided to the Division after the Court’s January 27, 2017 expert disclosure deadline, should not be permitted to qualify Ms. Hirsch as a quasi-expert in any field, as the Division was not given the opportunity to test that expertise or depose her as an expert. If offered for any other purpose, the exhibits should be precluded as irrelevant.

(holding that expert testimony could not be used “solely to bolster the credibility of the government’s fact witnesses by mirroring their version of events”). Respondents cannot “evade the expert witness disclosure requirements [] by simply calling an expert witness in the guise of a layperson.” Adv. Comm. Notes to 2000 Amd. to Fed. R. Evid. 701.

Brent Fields. The Division objects to Respondents’ proposal to call Brent Fields, the Secretary of the Commission, “to testify about various SEC documents, web pages, policies, and procedures regarding the constitutionality of SEC proceedings.” Presumably, Respondents seek such testimony (and related documents, e.g., Ex. 2283) to support a claim that the Commission’s method of hiring administrative law judges (ALJs) violates the Appointments Clause of the U.S. Constitution. See U.S. CONST. ART. II, § 2, cl. 2. But the Division does not dispute that Judge Foelak was not appointed in the manner required for constitutional officers. See Mohammed Riad & Kevin Timothy Swanson, Rel. No. 4420A, 2016 WL 3627183, at *47 (July 7, 2016). And because the Division believes that this is the only factual information legally relevant to a potential Appointments Clause challenge, the Division opposes Respondents’ intent to call Mr. Fields to testify. Moreover, the Commission has held that the Commission’s ALJs are employees, not constitutional officers, and thus are not subject to Article II’s requirements. See Harding Advisory LLC & Wing F. Chau, S.E.C. Rel. No. 4600, 2017 WL 66592, at *19 n.90 (Jan. 6, 2017).

Kyle Vataha. Respondents purport to offer the testimony of Kyle Vataha, an employee of the Funds’ valuation agent Pluris, to testify about “the valuation of the assets in the funds’ portfolio.” They have also included in their exhibit list an email between Mr. Vataha and Respondent Roni Dersovitz regarding the value of the Funds’ portfolio. See Resp. Ex. 1749.

Offering the testimony of Mr. Vataha is another example of Respondents’ wanting to have it both ways with respect to the advice they claim to have received from purported experts and

from counsel. Respondents have prevented the Division from inquiring into the very email they now purport to offer into evidence, a communication between Mr. Dersovitz and Mr. Vataha (a non-lawyer employee of a valuation firm), asserting the document is covered by the attorney-client privilege. See Ex. E (Div. Ex. 204 (Transcript of Testimony of Roni Dersovitz dated Jan. 29, 2016)) at 365:3-366:17. In fact, Respondents requested that the Division destroy copies of this and other such documents, alleging they were prepared in connection with Mr. Dersovitz's estate planning at the behest of his counsel. See Ex. F (Letter from T. Healy to V. Suthammanont dated Feb. 25, 2016) at 1-3; see also Ex. G (Email from S. Wolfe to J. Tenreiro & V. Suthammanont dated Feb. 10, 2016) (Respondents' valuation agent requesting similar sequestering of documents).

Evidence Mr. Vataha may offer regarding "the valuation" of the funds' assets is therefore unreliable and immaterial because, according to Respondents, his work had nothing to do with the valuation of the funds. "[Its] sole purpose [was] assisting [Mr. Dersovitz's counsel] with legal advice related to estate planning." See Ex. F at 2. In any event, fairness requires preclusion of evidence Respondents have previously shielded from scrutiny, particularly in light of their broader refusal to produce evidence regarding Mr. Dersovitz's financial condition. See generally Division's March 8, 2017 Motion in Limine to Preclude Respondents' Reliance Defense for Offering Memoranda and Marketing Materials, submitted herewith.

CONCLUSION

For the foregoing reasons, the Division respectfully requests that the Court grant its motion in limine to preclude Respondents from offering irrelevant, immaterial, unreliable, and duplicative documentary and testimonial evidence.

Dated: March 8, 2017

Respectfully submitted,

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Exhibit A

Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1001	--	RD Legal Capital Overview	RDLC-SEC 088568	
1002	--	RD Legal Capital, FAQ	RDLC-SEC 088590	
1003	--	RD Legal Unmapped Legal Fees	RDLC-SEC 1004765	Unreliable
1004	--	Special Opportunities Memorandum of Terms	SECLIT-EPROD-000007821	
1005	10/3/2001	Complaint in Peterson v. Islamic Republic of Iran , USDC, District of Columbia, Case No. 01-cv-02094-RCL	498 pp.	
1006	5/30/2003	Peterson v. Islamic Rep. of Iran , 264 F.Supp.2d 46 (D. D.C. 2003)	16 pp.	
1007	9/29/2003	SEC Staff Report titled "Implications for the Growth of Hedge Funds"	RDLC-SEC 1006544	Irrelevant, Immaterial
1008	6/8/2004	International Ass'n of Financial Engineers Investor Risk Committee (IAFE) Valuation Concepts for Investment Companies and Financial Institutions and Their Stakeholders	RDLC-SEC 1007016	
1009	8/11/2004	Poster from L. Metzger presentation on Valuation of Financial Assets Key Concepts and Issues	RDLC-SEC 1006678	
1010	1/31/2006	Poster from D. Martin presentation	RDLC-SEC 1006679	
1011	5/2/2007	Certificate of Formation	RDLC-SEC 942153	
1012	5/2/2007	RDLC - Certificate of Formation	RDLC-SEC 942319	
1013	5/7/2007	Designation for Services of Process	RDLC-SEC 940616	
1014	5/8/2007	NJ Certificate of Authority	RDLC-SEC 942156	
1015	5/17/2007	IRS EIN	RDLC-SEC 940548	
1016	7/18/2007	Appointment of First Director	RDLC-SEC 940554	
1017	7/31/2007	RDLFP Offering Memorandum (July 2007)	RDLC-SEC 939989	
1018	8/13/2007	08-13-07 - Wiss & Company Agreed Upon Procedures	RDLC-SEC 940539	Irrelevant
1019	8/30/2007	Preliminary Order Establishing Plaintiffs' Litigation Fund to Compensate and Reimburse Attorneys in USDC, Tenn. Case No. 3:06-MDL-01760, In re: Aredia and Zometa Prods Liability Litigation	14 pp.	
1020	9/7/2007	Judgment in Peterson v. Islamic Rep. of Iran	24 pp.	
1021	11/1/2007	October 2007 Investor Sheet	RDLC-SEC 940475	
1022	11/12/2007	11-12-07 - Engagement Letter for Fund AUP	RDLC-SEC 942238	
1023	11/29/2007	Order in USDC, Tenn. Case No. 3:06-MDL-01760, In re: Aredia and Zometa Prods. Liability Litigation	2 pp.	
1024	11/30/2007	November 2007 Investor Sheet	RDLC-SEC 940525	
1025	12/31/2007	RDLFOF 2007 Financial Statements	RDLC-SEC 065969	Irrelevant, Unreliable
1026	12/31/2007	RDLFP 2007 Financial Statements	RDLC-SEC 066018	Irrelevant, Unreliable
1027	12/31/2007	December 2007 Investor Sheet	RDLC-SEC 940080	
1028	12/31/2007	12-31-07 - Wiss & Co. AUP Report	RDLC-SEC 940680	Irrelevant, Unreliable
1029	12/31/2007	12-31-2007 RDLFOF Reviewed Financial Statements	RDLC-SEC 940723	Irrelevant, Unreliable
1030	12/31/2007	12-31-2007 RDLFP Reviewed Financial Statements	RDLC-SEC 940759	Irrelevant, Unreliable
1031	1/31/2008	January 2008 Investor Sheet	RDLC-SEC 940108	
1032	2/29/2008	Cohen Schedule A-3 (February 2008)	RDLC-SEC 100641 - 650	
1033	3/31/2008	March 2008 Investor Sheet	RDLC-SEC 940180	
1034	3/31/2008	03-31-08 - Wiss & Co. AUP Report	RDLC-SEC 940629	Irrelevant, Unreliable
1035	4/30/2008	April 2008 Investor Sheet	RDLC-SEC 940203	
1036	5/31/2008	May 2008 Investor Sheet	RDLC-SEC 940245	
1037	6/30/2008	June 2008 Investor Sheet	RDLC-SEC 940342	
1038	6/30/2008	06-30-08 - Wiss & Co. AUP Report	RDLC-SEC 940660	Irrelevant
1039	7/31/2008	July 2008 Investor Sheet	RDLC-SEC 940362	
1040	8/18/2008	RDLC - August 18, 2009 Registration Status	RDLC-SEC 940552	
1041	8/22/2008	Fay Master Agreement	SECLIT-EPROD000718915-26	
1042	8/22/2008	Fay Schedule A-1	SECLIT-EPROD000718954-968	
1043	8/22/2008	Fay First Amendment to Schedule A-1	SECLIT-EPROD000718928 - 930	
1044	8/27/2008	Fay Guaranty	SECLIT-EPROD000718932-36	Irrelevant, Immaterial
1045	8/29/2008	Master Assignment and Sale Agreement	RDLC-SEC 097586	
1046	8/31/2008	August 2008 Investor Sheet	RDLC-SEC 940407	
1047	9/30/2008	September 2008 Investor Sheet	RDLC-SEC 940472	
1048	9/30/2008	09-30-08 - Wiss & Co. AUP Report	RDLC-SEC 940670	Irrelevant, Unreliable
1049	10/31/2008	RDLFP Offering Memorandum (October 2008)	RDLC-SEC 065705	
1050	10/31/2008	October 2008 Investor Sheet	RDLC-SEC 940517	
1051	11/24/2008	Osborn Schedules	SECLIT-EPROD000713184-306	
1052	11/24/2008	Schedule A-1 to Master Agreement and Sale Agreement between Osborn Law and RD Legal Funding, LLC	SECLIT-EPROD-000713184 - 203	
1053	11/30/2008	November 2008 Investor Sheet	RDLC-SEC 940524	
1054	12/15/2008	RDLFP & RDLFOF - Temporary Concentration Limit Changes & policy changes RE plaintiff funding (12.15.08)	RDLC-SEC 940799	
1055	12/15/2008	Letter from R. Dillon re RDLF Policy & Procedure Changes (December 2008)	RDLC-SEC 943440 - 442	
1056	12/31/2008	RDLFP 2008 Financial Statements	RDLC-SEC 066031	Irrelevant
1057	12/31/2008	December 2008 Investor Sheet	RDLC-SEC 940106	
1058	12/31/2008	12-31-08 - Wiss & Co. AUP Report	RDLC-SEC 940690	Irrelevant, Unreliable
1059	12/31/2008	12-31-2008 RDLFOF Audited Financial Statements	RDLC-SEC 940724	Irrelevant
1060	12/31/2008	12-31-2008 RDLFP Audited Financial Statements	RDLC-SEC 940760	Irrelevant
1061	1/31/2009	January 2009 Investor Sheet	RDLC-SEC 940116	
1062	2/28/2009	February 2009 Investor Sheet	RDLC-SEC 940176	
1063	3/31/2009	March 2009 Investor Sheet	RDLC-SEC 940185	
1064	3/31/2009	03-31-09 - Wiss & Co. AUP Report	RDLC-SEC 940638	Irrelevant, Unreliable
1065	3/31/2009	Independent Accountant's Report on Applying Agreed-Upon Procedures for RD Legal Funding, LLC prepared by Wiss & Co.	SECLIT-EPROD-001337643 - 651	Irrelevant, Unreliable

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1066	4/17/2009	R. Rowella email to S. Geraci re RD Legal Funding - Asset Based Lending Fund with attachments	RDLC-SEC 1006387 - 507	Unreliable
1067	4/30/2009	April 2009 Investor Sheet	RDLC-SEC 940206	
1068	5/4/2009	Rick Rowella email to Bill Beckers re RD Legal Funding - Asset Based Lending fund with attachments - RD Legal Funding Offshore Fund, Ltd. Investor Sheet, RD Legal Funding Partners, LP Executive Summary and RD Legal Funding Offshore Fund, Ltd. Marketing Presentation	RDLC-SEC 0978221 - 257	Unreliable
1069	5/18/2009	Cohen Schedule A-6 (May 2009)	SECLIT- EPROD000803284 - 295	
1070	5/28/2009	Cohen Master Agreement (May 2009)	SECLIT- EPROD000035825 - 837	
1071	5/31/2009	May 2009 Investor Sheet	RDLC-SEC 940289	
1072	6/30/2009	June 2009 Investor Sheet	RDLC-SEC 940356	
1073	6/30/2009	06-30-09 - Wiss & Co. AUP Report	RDLC-SEC 940560	Irrelevant, Unreliable
1074	6/30/2009	Fund Administration Services Agreement with Woodfield (June 2009)	SECLIT-EPROD- 000854191	Irrelevant
1075	7/31/2009	July 2009 Investor Sheet	RDLC-SEC 940405	
1076	8/12/2009	R. Rowella email to B. Beckers re RD Legal Funding Investment Manager Meeting Request with attachment	RDLC-SEC 0977519 - 521	Unreliable
1077	8/12/2009	R. Dersovitz email to S. Geraci, R. Rowella, Robin Dillon re RD Legal Funding Partners, LP with attachments	RDLC-SEC 1006597 - 607	
1078	8/13/2009	Directors Resolution Authorizing Amendment of Offering Documents	RDLC-SEC 940556	
1079	8/31/2009	August 2009 Investor Sheet	RDLC-SEC 940537	
1080	8/31/2009	RDLFP Offering Memorandum (August 2009)	SECLIT-EPROD- 000721099 - 131	
1081	9/23/2009	R. Rowella email to A. Hirsch introducing fund and strategy	RDLC-SEC 176362 - 400	
1082	9/23/2009	Rick Rowella email to Amy Hirsch re RD Legal Funding - Credit Opportunity Fund with attachments - Marketing presentation, Executive Summary, Investor Sheet, Total Alternative article re Fund to Front Attorney Settlement Fees	SECLIT-EPROD- 000277543 - 580	
1083	9/30/2009	09-30-09 - Wiss & Co. AUP Report	RDLC-SEC 940394	Irrelevant, Unreliable
1084	9/30/2009	September 2009 Investor Sheet	RDLC-SEC 940470	
1085	10/21/2009	Esther Rosa email to Jessica Robinson; cc B. Laraja, D. Osborn, L. Noonan re Osborn Law Schedule A-14 with attachment	RDLC-SEC 506746 - 756	
1086	10/26/2009	10-26-2009 Certificate of Amendment of Certificate of Limited Partnership of RD Legal Funding Partners, LP	RDLC-SEC 940571	
1087	10/31/2009	October 2009 Investor Sheet	RDLC-SEC 940520	
1088	11/30/2009	November 2009 Investor Sheet	RDLC-SEC 940078	
1089	12/3/2009	12.03.09 RDLFP- RDLFOF Temporary Concentration Limit Changes	RDLC-SEC 940803	
1090	12/3/2009	R. Dillon email to M. Giulioli, R. Dersovitz, L. Nahabedian re RDLF Concentration of Limit Changes	SECLIT-EPROD- 000843470 - 472	
1091	12/31/2009	RDLFP 2009 Financial Statements	RDLC-SEC 065983	Irrelevant
1092	12/31/2009	RD Legal Funding Partners, LP, Financial Statements and Independent Auditors' Report	RDLC-SEC 066048	Irrelevant
1093	12/31/2009	December 2009 RDLFOF Investor Sheet	RDLC-SEC 940120	
1094	12/31/2009	December 2009 RDLFP Investor Sheet	RDLC-SEC 940123	
1095	12/31/2009	12-31-2009 RDLFOF Audited Financial Statements	RDLC-SEC 940741	Irrelevant
1096	12/31/2009	12-31-2009 RDLFP Audited Financial Statements	RDLC-SEC 940777	Irrelevant
1097	1/31/2010	January 2010 RDLFOF Investor Sheet	RDLC-SEC 940187	
1098	1/31/2010	January 2010 RDLFP Investor Sheet	RDLC-SEC 940190	
1099	2/28/2010	February 2010 RDLFOF Investor Sheet	RDLC-SEC 940193	
1100	2/28/2010	February 2010 RDLFP Investor Sheet	RDLC-SEC 940196	
1101	3/31/2010	March 2010 RDLFOF Investor Sheet	RDLC-SEC 940237	
1102	3/31/2010	06-11-10 - RDLFP - Investor Sheet - Mar. 10	RDLC-SEC 940240	
1103	3/31/2010	03-31-10 - Wiss & Co. AUP Report	RDLC-SEC 940648	Irrelevant, Unreliable
1104	3/31/2010	Wiss Report (March 2010)	SECLIT- EPROD000842711 - 750	Unreliable
1105	3/31/2010	Independent Accountant's Report on Applying Agreed-Upon Procedures for RD Legal Funding, LLC prepared by Wiss & Co.	SECLIT-EPROD- 000847132 - 143	Irrelevant
1106	4/30/2010	April 2010 RDLFOF Investor Sheet	RDLC-SEC 940294	
1107	4/30/2010	March 2010 RDLFP Investor Sheet	RDLC-SEC 940297	
1108	5/28/2010	Master Agreement between The Perles Law Firm, PC and RD Legal Funding Partners, LP	RDLC-SEC 097708 - 719	
1109	5/28/2010	Perles - Schedule A-2 (3)	RDLC-SEC 097720	
1110	5/28/2010	First Amendment to Master Agreement between The Perles Law Firm, PC and RD Legal Funding Partners, LP	RDLC-SEC 097729 - 731	
1111	5/28/2010	Guaranty in favor of RD Legal Funding Partners, LP by Guarantor S. Perles	RDLC-SEC 097732 - 737	Irrelevant
1112	5/28/2010	Guaranty Between RD Legal and Perles Law Firm	RDLC-SEC 657914 - 919	Irrelevant
1113	5/31/2010	May 2010 RDLFOF Investor Sheet	RDLC-SEC 940300	
1114	5/31/2010	May 2010 RDLFP Investor Sheet	RDLC-SEC 940303	
1115	6/30/2010	June 2010 RDLFOF Investor Sheet	RDLC-SEC 940347	
1116	6/30/2010	June 2010 RDLFP Investor Sheet	RDLC-SEC 940350	
1117	6/30/2010	06-30-2010- Wiss & Co. AUP Report	RDLC-SEC 940700	Irrelevant, Unreliable
1118	6/30/2010	Wiss Report (June 2010)	SECLIT- EPROD000842949 - 991	Unreliable
1119	7/31/2010	July 2010 RDLFOF Investor Sheet	RDLC-SEC 940444	
1120	7/31/2010	July 2010 RDLFP Investor Sheet	RDLC-SEC 940447	
1121	8/6/2010	M. Chandarana email to H. Maclellan re RDLFP & RDLFOF Investor Sheet - June 2010 with attachments	RDLC-SEC 0976718 - 724	

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1122	8/8/2010	August 8, 2010 Financial Times	RDLC-SEC 940353	Irrelevant
1123	8/9/2010	Meesha Chandarana to A. Hirsch re RDLFP & RDLFOF Investor Sheet - June 2010 with attachments - June 2010 Investor sheets	SECLIT-EPROD-000273856 - 859	
1124	8/31/2010	August 2010 RDLFOF Investor Sheet	RDLC-SEC 940450	
1125	8/31/2010	August 2010 RDLFP Investor Sheet	RDLC-SEC 940453	
1126	9/15/2010	Joseph Genovesi email to J. Genovesi, R. Dersovitz, A. Hirsch, R. Zimmer, M. Chandarana re Final Presentation with attachment - PCS Revised Marketing Presentation.ppt	SECLIT-EPROD-000272794 - 822	
1127	9/27/2010	R. Dillon email to T. Lowe; cc R. Dersovitz, R. Rowella, L. Nahabedian, M. Chandarana and earlier emails re Hugh McClellan with attachments	RDLC-SEC 0965347 - 351	
1128	9/28/2010	Email Communication regarding Garve Ivey Exposure & Non-Recourse Participant	RDLC-SEC 940798	Unreliable
1129	9/30/2010	09-30-2010- Wiss & Co. AUP Report	RDLC-SEC 940369	Irrelevant
1130	9/30/2010	September 2010 RDLFOF Investor Sheet	RDLC-SEC 940462	
1131	9/30/2010	September 2010 RDLFP Investor Sheet	RDLC-SEC 940465	
1132	9/30/2010	Independent Accountant's Report on Applying Agreed-Upon Procedures for RD Legal Funding, LLC prepared by Wiss & Co.	SECLIT-EPROD-000847120-131	Irrelevant
1133	10/8/2010	R. Dersovitz email to A. Hirsch, R. Rowella; cc M. Chandarana, Kevin Mallon re FW: HSBC - Japan	SECLIT-EPROD-000272611 - 615	
1134	10/31/2010	October 2010 Investor Sheet	RDLC-SEC 940522	
1135	11/11/2010	P. Craig Notes from meeting with R. Rowella of RD Legal Funding	SECLIT-EPROD-000049628 - 630	
1136	11/30/2010	November 2010 Investor Sheet	RDLC-SEC 940456	
1137	12/14/2010	Smith Mazure memorandum re: Beatie & Osborn, LLP	RDLC-SEC 464492	Unreliable
1138	12/16/2010	M. Berman notes re meetings with R. Dersovitz, Rick Rowella and M. Giulioi from April 2010 through December 16, 2010	SECLIT-EPROD-000703498 - 536	Unreliable
1139	12/31/2010	RDLFP 2010 Financial Statements	RDLC-SEC 052679	Irrelevant
1140	12/31/2010	December 2010 Investor Sheet	RDLC-SEC 940112	
1141	12/31/2010	12-31-2010 RDLFOF Audited Financial Statements	RDLC-SEC 940478	Irrelevant
1142	12/31/2010	12-31-2010 RDLFP Audited Financial Statements	RDLC-SEC 940499	Irrelevant
1143	1/31/2011	January 2011 Investor Sheet	RDLC-SEC 940174	
1144	2/15/2011	A. Hirsch email to R. Dersovitz and others	RDLC-SEC 174453	
1145	2/15/2011	A. Hirsch email to R. Dersovitz; cc Irena Norton, R. Rowella, K. Mallon, M. Chandarana, Barbara Laraia, J. Genovesi, A. Hirsch, Robin Zimmer re Final RD Client Presentation with attachment - RD Final Marketing Presentation 2011_02_15.ppt	SECLIT-EPROD-000273366 - 393	
1146	2/18/2011	M. Chandarana email to T. Lowe re RD Legal Capital Presentation with attachment	RDLC-SEC 0966286 - 315	
1147	2/18/2011	M. Chandarana email to T. Lowe; cc R. Rowella, R. Dersovitz re RDLF Domestic Fund Documents (MacLellan Foundation) with attachments	RDLC-SEC 0971217 - 338	
1148	2/28/2011	February 2011 Investor Sheet	RDLC-SEC 940178	
1149	2/28/2011	RD Legal Admin, Nimisha Patel email to A. Lorber, A. Gofflot, Steve Dabbah, Nomura funds, S. Tarnav; cc M. Chandarana, R. Dersovitz, L. Nahabedian, R. Rowella re Revised: RD Legal Funding Offshore Fund, Ltd. - Redemption Request Received Confirmation with attachment	RDLC-SEC-965718	
1150	3/15/2011	Perles - Schedule A-3 (3)	RDLC-SEC 097738	
1151	3/31/2011	03-31-2011- Wiss & Co. AUP Report	RDLC-SEC 940126	Irrelevant, Unreliable
1152	3/31/2011	March 2011 Investor Sheet	RDLC-SEC 940208	
1153	4/8/2011	S. Perles email to R. Dersovitz re: positive developments in Peterson litigation	RDLC-SEC 657844	Unreliable
1154	4/11/2011	M. Chandarana email to T. Lowe; cc R. Rowella re RDLF Offshore Documents (Tom Lowe) with attachments	RDLC-SEC 0970834 - 956	
1155	4/11/2011	Fay Amended Master Agreement (Peterson April 2011)	SECLIT-EPROD000719272 - 283	
1156	4/11/2011	Fay First Amendment to Schedule A-2	SECLIT-EPROD000719298 - 304	
1157	4/12/2011	M. Chandarana email to T. Lowe; cc R. Rowella, S. Barber and earlier emails re RDLF Offshore Documents (Tom Lowe) with attachments	RDLC-SEC 0970826 - 831	
1158	4/19/2011	M. Chandarana email to T. Lowe and earlier emails re RDLF Domestic Fund Documents (Hugh & Charlotte MacLellan Charitable Trust)	RDLC-SEC 0975978 - 979	
1159	4/19/2011	Guaranty Between RD Legal and Fay Kaplan Law Firm	RDLC-SEC 607361 - 365	Irrelevant
1160	4/19/2011	Fay Schedule A-2 (Peterson April 2011)	SECLIT-EPROD000719284 - 292	
1161	4/19/2011	Fay Guaranty (April 2011)	SECLIT-EPROD000719293 - 297	Irrelevant
1162	4/20/2011	Schedule A-2 to Master Assignment and Sale	RDLC-SEC 097598	
1163	4/20/2011	First Amendment to Schedule A-2 to Master Assignment and Sale	RDLC-SEC 097633	
1164	4/20/2011	Perles - Schedule A-4 (3)	RDLC-SEC 097748	
1165	4/28/2011	RD Legal Admin, Nimisha Patel to A. Lorber, A. Gofflot, S. Dabbah, Nomura funds, I. Levorato, S. Tarnav; cc M. Chandarana, R. Dersovitz, L. Nahabedian, R. Rowella re RD Legal Funding Offshore Fund, Ltd. - Redemption Request Received Confirmation with attachment	RDLC-SEC-0965716 - 717	
1166	4/29/2011	Non-disclosure agreement accompanying L. Zatta employment letter	LZ-SEC-0000043	
1167	4/29/2011	L. Zatta's employment letter.	LZ-SEC-0000046	
1168	4/29/2011	M. Chandarana email to T. Lowe re Name for Reference	RDLC-SEC 0975967 - 968	
1169	4/30/2011	April 2011 Investor Sheet	RDLC-SEC 940235	
1170	4/30/2011	Form ADV - Part 2A (April 2011)	SECLIT-EPROD-000012956	
1171	5/5/2011	Perles - Schedule A-5 (3)	RDLC-SEC 097758	
1172	5/18/2011	Perles - Schedule A-6 (4)	RDLC-SEC 097767	

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1173	5/23/2011	Wiss engagement agreement with RDLF	SECLIT-EPROD-000843455	
1174	5/31/2011	May 2011 Investor Sheet	RDLC-SEC 940345	
1175	6/8/2011	Fay Schedule A-3 (Peterson June 2011)	SECLIT-EPROD-000719079-88	
1176	6/8/2011	Fay First Amendment to Schedule A-3	SECLIT-EPROD-000719089-91	
1177	6/13/2011	K. Mallon email to R. Rowella, M. Chandarana and earlier emails re RD Legal Capital - Investment Manager Meeting Request with attachment	RDLC-SEC 0966702 - 705	
1178	6/14/2011	Kevin Mallon meeting invitation re Meeting with B. Beckers - Managing Director - Santa Barbara Investment Capital	RDLC-SEC 0952868	
1179	6/14/2011	K. Mallon meeting invitation to R. Rowella, M. Chandarana	RDLC-SEC 0952869	
1180	6/14/2011	K. Mallon email to M. Chandarana and earlier emails re latest RD Legal info	RDLC-SEC 0975949 - 950	
1181	6/14/2011	M. Chandarana email forward to K. Mallon or RD Legal email to D.Backens re RD Legal Capital - Account Created	RDLC-SEC 0976614	
1182	6/14/2011	K. Mallon email to M. Chandarana re RD Legal Capital - Account Creator	RDLC-SEC 0976615	
1183	6/20/2011	Email from R. Dersovitz to Barbara.	Wiss 000473	
1184	6/22/2011	K. Mallon email to B. Beckers; cc R. Rowella, R. Dersovitz, M.Chandarana re RDLF Domestic Fund Documents with attachments	RDLC-SEC 0964437 - 560	
1185	6/22/2011	M. Chandarana email to J. Burrow re Call with R D Legal Capital with attachments	RDLC-SEC_1007072 - 092	
1186	6/22/2011	L. Vigna email to Investors; cc R. Dersovitz, L. Nahabedian, R. Rowella, M. Chandarana re RDLF 1st Qtr 2011 AUP Report with attachment	RDLC-SEC 1005828 - 843	Unreliable
1187	6/29/2011	A. Hirsch email to M. Chandarana, J. Genovesi, R. Rowella; cc B. Larriere 9/11 Presentation with attachment - First Responder Mktg Pres.ppt	SECLIT-EPROD-000275121 - 138	
1188	6/30/2011	Pturis Valuation Data	RDLC-SEC 001500	Unreliable
1189	6/30/2011	Portfolio Valuation Report for RDLF (Pturis)	RDLC-SEC 001501	
1190	6/30/2011	M. Chandarana email to P. Craig; cc R. Rowella and earlier emails re RDLF Domestic Fund Documents with attachments	RDLC-SEC 0970454 - 583	
1191	6/30/2011	Pturis Retainer Agreement (June 2011)	RDLC-SEC 293882	
1192	6/30/2011	06-30-2011- Wiss & Co. AUP Report	RDLC-SEC 940248	Irrelevant, Unreliable
1193	6/30/2011	June 2011 Investor Sheet	RDLC-SEC 940358	
1194	6/30/2011	J. Genovesi email to R. Dersovitz, R. Rowella, A. Hirsch, M. Chandarana, Philip Larochele re Investor Letter regarding obligor limits with attachment - Concentration Limits	SECLIT-EPROD-000275859 - 860	
1195	6/30/2011	R. Rowella email to M. Chandarana and earlier emails re interest in RD Legal	RDLC-SEC 1005472 - 473	
1196	7/6/2011	Email chain between Phil and Kevin Regan	RDLC-SEC 091759	
1197	7/10/2011	R. Dersovitz email to D. Osborn; cc I. Norton re Beatie and Osborn with attachment - Order to Show Cause in New York Supreme Court, Index No.601506/08 Korsinsky v. Beatie and Osborn, et al.	RDLC-SEC 796955 - 7010	Unreliable
1198	7/11/2011	J. Genovesi email to A. Hirsch, Kamil Zaatar, Leo Zatta re 9/11 FirstResponders Marketing Presentation	SECLIT-EPROD-000275216	
1199	7/11/2011	M. Chandarana email to J. Burrow re R D Legal Capital with attachments	RDLC-SEC-1007344 - 392	
1200	7/18/2011	M. Chandarana email to all re RDLFP & RDLFOF Investor Sheet - May 2011 with attachment	RDLC-SEC 1006260 - 262	
1201	7/21/2011	M. Chandarana meeting invitation to R. Rowella, K. Mallon, R. Dersovitz, Robin Zimmer, R. Matos re 7/28/11 meeting with P. Craig	RDLC-SEC 1006383	
1202	7/27/2011	M. Chandarana email response to P. Craig; cc R. Rowella re RD Legal Capital - References with attachments	RDLC-SEC 0975837 - 839	
1203	7/27/2011	M. Chandarana email to T. Lowe re R D Legal Capital - Reference	RDLC-SEC 0975842	
1204	7/28/2011	M. Chandarana email to J. Riley re RD Legal Capital - Credit Opportunity Fund - May YTD Net Monthly Return 5.418% with attachments	RDLC-SEC 0975791 -	
1205	7/28/2011	Richard Basile email to P. Craig and earlier emails re RD Legal	SECLIT-EPROD-000050101 - 102	
1206	7/28/2011	P. Craig email to Tom Lowe and earlier emails re RD Legal	SECLIT-EPROD-000050630	
1207	7/28/2011	Valuation letter	SEC EX 127	
1208	7/31/2011	Pturis Valuation Data	RDLC-SEC 001508	Unreliable
1209	7/31/2011	July 2011 Investor Sheet	RDLC-SEC 940365	
1210	7/31/2011	Richard McCune email to P. Craig and earlier emails re RD Legal	SECLIT-EPROD-000050103	
1211	8/3/2011	Fay Schedule A-4 (August 2011)	SECLIT-EPROD000719122-29	
1212	8/3/2011	Fay First Amendment to Schedule A-4 (August 2011)	SECLIT-EPROD000719130 - 132	
1213	8/9/2011	A. Ishimaru email to P. Craig and earlier emails re reference checks	SECLIT-EPROD-000050104 - 105	
1214	8/10/2011	P. Craig letter to R. Rowella re documents	SECLIT-EPROD-000049631 - 632	
1215	8/12/2011	M. Chandarana email to P. Craig re New Subscription with attachments	RDLC-SEC 0966209 - 220	
1216	8/12/2011	R. Dersovitz email to S. Gottlieb requesting feedback (from a compliance perspective) on short marketing blurb	RDLC-SEC 177964	
1217	8/12/2011	N. Patel transmittal to P. Craig of Woodfield Acknowledgement of Subscription Amount Received	SECLIT-EPROD-000049916	
1218	8/13/2011	Subscription Agreement to Become a Limited Partner in RD Legal Funding Partners, LP signed by Paul Craig	SECLIT-EPROD-000049579 - 587	
1219	8/15/2011	M. Chandarana email to N. Patel, RD Legal Admin; cc L. Zatta, L. Nahabedian, R. Rowella re Paul Craig Subscription with attachment	RDLC-SEC-1005645 - 647	

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1220	8/16/2011	N. Patel letter to P. Craig	SECLIT-EPROD-000049706	
1221	8/17/2011	S. Perles email to R. Dersovitz re: Peterson litigation	RDLC-SEC 470967	
1222	8/26/2011	M. Chandarana email to J. Burrow; cc R. Rowella and earlier emails re RD Legal Capital with attachment	RDLC 1007435 - 439	
1223	8/31/2011	Confidential Explanatory Memorandum for RD Legal Funding Offshore Fund, Ltd.	RDLC-SEC 000219 - 260	
1224	8/31/2011	Pluris Valuation Data	RDLC-SEC 001516	Unreliable
1225	8/31/2011	R. Dersovitz email to T. Lowe, R. Rowella, L. Zatta; cc B. Ward re additional investments	RDLC-SEC 0979710 - 711	
1226	8/31/2011	RD Legal Funding Partners & RD Legal Funding Offshore Fund presentation	RDLC-SEC 172458 - 486	
1227	8/31/2011	August 2011 Investor Sheet	RDLC-SEC 940367	
1229	8/31/2011	RD Legal Funding Partners & RD Legal Funding Offshore Fund, Presentation	RDLC-SEC-1007067 - 071	
1230	8/31/2011	J. Burrow email to M. Chandarana; cc R. Rowella and earlier emails re RD Legal Capital	RDLC-SEC-1007067 - 071	
1232	9/1/2011	Perles - Schedule A-7 (4)	RDLC-SEC 097776	
1233	9/1/2011	K. Mallon email to J. Burrow; cc R. Rowella, M. Chandarana re RDLF Domestic Fund Documents (Mark Hogan) with attachments	RDLC-SEC-1007219 - 343	
1234	9/7/2011	RD Legal, R. Rowella email to J. Riley re RD Legal Capital - Account Createc	RDLC-SEC 0966316	
1235	9/7/2011	M. Chandarana email to J. Riley and earlier emails re Call with R D Legal Capital	RDLC-SEC 0975653 - 656	
1236	9/7/2011	M. Chandarana email to J. Burrow and earlier emails re RDLF Domestic Fund Documents (Mark Hogan)	RDLC-SEC-1007432 - 434	
1237	9/8/2011	K. Mallon email to M. Chandarana, R. Rowella and earlier emails re RD Legal Capital - Credit Opportunity Fund - Performance Update - July 2011 YTD Net Monthly Return	RDLC-SEC 0964233 - 235	
1238	9/16/2011	J. Burrow email to M. Chandarana and earlier emails re RDLF Domestic Fund Documents	RDLC-SEC-1007064 - 066	
1239	9/26/2011	R. Rowella email to T. Lowe; cc R. Dersovitz, L. Zatta and earlier emails re questions	RDLC-SEC 0957697 - 699	
1240	9/28/2011	K. Mallon email to D. Backens; cc R. Rowella, M. Chandarana, KamilZaatar re RD Legal Answers to Certis Capital Questions with attachments	RDLC-SEC 711894 - 922	Unreliable
1241	9/30/2011	Pluris Valuation Data	RDLC-SEC 001524	Unreliable
1242	9/30/2011	RDLFP LPA (September 2011)	RDLC-SEC 665122	
1243	9/30/2011	09-30-2011- Wiss & Co. AUP Report	RDLC-SEC 940381	Irrelevant, Unreliable
1244	9/30/2011	September 2011 Investor Sheet	RDLC-SEC 940458	
1245	9/30/2011	Fund DDQ (September 2011)	SECLIT-EPROD-000007806	
1246	9/30/2011	N. Patel email to Investors; cc R. Dersovitz, L. Nahabedian, R. Rowella, M. Chandarana, L. Zatta re RDLF 2nd Qtr 2011 AUP Report with attachmen	RDLC-SEC 1006608	Irrelevant; Unreliable
1247	10/3/2011	Email from Kevin Regan to Eric Liu.	RDLC-SEC 078718	
1248	10/5/2011	M. Chandarana email to P. Craig and earlier emails re RD's website	RDLC-SEC 0975603 - 605	
1249	10/31/2011	Pluris Valuation Data	RDLC-SEC 001532	Unreliable
1250	10/31/2011	RD Legal Monthly Data	RDLC-SEC 1004747	
1251	10/31/2011	October 2011 Investor Sheet	RDLC-SEC 940468	
1252	11/7/2011	R. Dersovitz email to S. Perles re Peterson v. Iran	RDLC-SEC 536153 - 154	
1253	11/7/2011	Fay Schedule A-5 (November 2011)	SECLIT-EPROD000719133-39	
1254	11/8/2011	L. Zatta email to D. Schall; cc RD re Confirming tomorrow with attachments - RD Legal Funding Partners, LP Draft Financial Statements 12.31.10 and 20110811 RD Legal Capital, LLC Opinion letter - Fina	RDLC-SEC 488284 - 302	
1255	11/10/2011	M. Chandarana email to T. Lowe re Reference name	RDLC-SEC 0975564	
1256	11/10/2011	M. Chandarana email to J. Riley and earlier emails re Meeting with RD Legal Capital with attachment	RDLC-SEC 0975565 -	
1257	11/10/2011	Jack Rigney email response to J. Riley re RD Legal Capital	SECLIT-EPROD-000835090 - 092	Unreliable
1258	11/12/2011	Guy Miller, RKCO email to J. Riley; cc R. Dersovitz re RD Legal Capital RKCO:0009300357	SECLIT-EPROD-00716178 - 180	Unreliable
1259	11/14/2011	M. Chandarana email to J. Riley; cc R. Rowella and earlier emails re Meeting with RD Legal Capital with attachment	RDLC-SEC 0975554 -	
1260	11/14/2011	M. Chandarana email to J. Burrow; cc J. Gordo and earlier emails re Meeting with RD Legal Capital with attachment	RDLC-SEC-1007398 - 431	
1261	11/14/2011	L. Budzynski email to RD Legal Investors re RD Legal Funding Offshore Fund, LTD - 2010 Financial Statement and Independent Auditor's Report with attachment	RDLC-SEC 1005776 - 797	Unreliable
1262	11/14/2011	L. Budzynski email to RD Legal Investors re RD Legal Funding Partners, LP - 2010 Financial Statement and Independent Auditor's Report with attachmen	RDLC-SEC 1005798 - 816	Unreliable
1263	11/15/2011	L. Budzynski email to RD Legal Investors; cc R. Dersovitz, L. Nahabedian, R. Rowella, M. Chandarana, L. Zatta re RDLF 3rd Qtr 2011 AUP Report with attachment	RDLC-SEC 1005764 - 775	Unreliable
1264	11/22/2011	K. Mallon email to J. Riley; cc R. Rowella, M. Chandarana re RDLF Domestic Fund Documents (J. Riley) with attachments	RDLC-SEC 0970270 - 395	
1265	11/23/2011	M. Chandarana email to R. Dersovitz, T. Lowe; cc R. Rowella re no subject with attachments	RDLC-SEC 0956214 - 240	
1266	11/29/2011	M. Chandarana email to J. Riley and earlier emails re RDLF Domestic Fund Documents (J. Riley) with attachments	RDLC-SEC 0970221 - 269	
1267	11/30/2011	Pluris Valuation Data	RDLC-SEC 001540	Unreliable
1268	11/30/2011	T. Lowe email to M. Chandarana re Name for Reference	RDLC-SEC 0963330 - 331	
1269	11/30/2011	RD Legal Monthly Data	RDLC-SEC 1004748	

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1270	11/30/2011	November 2011 Investor Sheet	RDLC-SEC 940526	
1271	12/1/2011	Document entitled "RD Legal Capital Valuation Policy - FINAL 12/1/11"	RDLC-SEC 266807 - 808	
1272	12/2/2011	J. Riley email to R. Rowella; cc D. Friedman, R. Dersovitz, C. Riley, M. Chandarana re Wire completed with attachment	RDLC-SEC 0965614 -	
1273	12/3/2011	R. Dersovitz email to S. Perles	RDLC-SEC 535827	
1274	12/5/2011	R. Dersovitz email to A. Hirsch with attachments	RDLC-SEC 799919 - 928	
1275	12/6/2011	R. Dersovitz email to A. Hirsch asking for advice on incorporating write ups into DDO and PPM	RDLC-SEC 180166	
1276	12/6/2011	M. Chandarana email to S. Dabbah; cc R. Dersovitz re Star Navigator Investments, lld with attachments	RDLC-SEC-0970095 - 220	
1277	12/8/2011	L. Budzynski email to RD Legal Admin, S. Dabbah, A. Lorber, S. Tamav, Nomura funds, I. Levorato; cc L. Nahabedian, R. Rowella, M. Chandarana re Full Withdrawal Confirmation: RD Legal LTD - Nomura Bank in favor of Star Navigator Invs. with attachment	RDLC-SEC-09767640 - 641	
1278	12/15/2011	A. Hirsch email to R. Dersovitz re: Policies	RDLC-SEC 253163 - 180	Irrelevant, Immaterial
1279	12/16/2011	12.16.2011 RDLFP & RDLFOF Fund Transparency & Review Processes	RDLC-SEC 940518	
1280	12/21/2011	Email Communication regarding Retention of Marcum, LLP	RDLC-SEC 941074	
1281	12/22/2011	12.22.11 Redemption and Liquidation Account Policy	RDLC-SEC 941393	Irrelevant
1282	12/31/2011	Confidential Private Offering Memorandum of RD Legal Funding Partners, LP	RDLC-SEC 000566 - 598	
1283	12/31/2011	Confidential Private Offering Memorandum Limited Partnership Interests of RD Legal Funding Partners, LP	RDLC-SEC 000599 - 631	
1284	12/31/2011	Pluris Valuation Data	RDLC-SEC 001548	Unreliable
1285	12/31/2011	RDLFP 2011 Financial Statements	RDLC-SEC 002179	Irrelevant
1286	12/31/2011	RD Legal Funding Partners, LP, Financial Statements and Independent Auditors' Report	RDLC-SEC 002204	Irrelevant
1287	12/31/2011	RD Legal Full Portfolio Data	RDLC-SEC 1004766	Unreliable
1288	12/31/2011	RD Legal Monthly Data	RDLC-SEC 340175	
1289	12/31/2011	December 2011 Investor Sheet	RDLC-SEC 940083	
1290	12/31/2011	12-31-2011 RDLFOF Audited Financial Statements	RDLC-SEC 940955	Irrelevant
1291	12/31/2011	12-31-2011 RDLFP Audited Financial Statements	RDLC-SEC 941034	Irrelevant
1292	12/31/2011	RD Legal Funding Offshore Fund, Ltd. Financial Statements	SECLIT-EPROD-000704809 - 833	Irrelevant
1293	12/31/2011	RD Legal Funding Partners, LP Financial Statements	SECLIT-EPROD-000704928 - 950	Irrelevant
1294	12/31/2011	Dersovitz 1040 Tax Return for 2011	RDLC 1007048	Unreliable
1295	1/11/2012	S. Dabbah email to M. Chandarana and earlier emails re RD Legal Capital with attachment	RDLC-SEC-0965775 - 793	
1296	1/11/2012	M. Chandarana email to S. Dabbah and earlier emails re RD Legal Capital with attachments	RDLC-SEC-0982139 - 266	
1297	1/18/2012	Email from Eric Liu to P. Laroche	RDLC-SEC 051282	
1298	1/18/2012	K. Mallon email to D. Backens; cc D. Dent, L. Zatta, R. Rowella and earlier emails re RD Legal Answers to Certis Capital Questions with attachments	SECLIT-EPROD-000715982 - 997	
1299	1/18/2012	K. Mallon email to D. Backens; cc D. Dent, L. Zatta, R. Rowella and earlier emails re RD Legal Answers to Certis Capital Questions with attachment	SECLIT-EPROD-000715982 - 997	
1300	1/19/2012	RD Legal Admin email to H. Maclellan; cc M. Chandarana, R. Rowella, L. Nahabedian re Partial Redemption Confirmation - RD Legal Funding Partners, LP with attachment	RDLC-SEC 0967606 - 607	
1301	1/19/2012	J. Simon (Smith Mazure) letter to L. Zatta re audit	RDLC-SEC 324594 - 600	Unreliable
1302	1/19/2012	J. Genovesi email to C. Tavel re Meyers Evans & Assocs. With attachments- Credit Review Memo and Meyers & Evans Financial Spreadshee	RDLC-SEC 472753 -765 and 3 pp.	Irrelevant
1303	1/20/2012	S. Dabbah email to M. Chandarana re Share Transfer to Star Navigator Investments, lld with attachments	RDLC-SEC-963148	
1304	1/24/2012	K. Mallon email to M. Chandarana re RDLFP & RDLFOF (combined) Investor Sheet - November 2011 with earlier exchanges with B. Beckers and R. Rowella	RDLC-SEC 923254 - 256	
1305	1/25/2012	K. Mallon email to B. Beckers; cc R. Rowella, R. Dersovitz, M. Chandarana re RD Legal Capital, LLC - Subscription Documents with attachments	RDLC-SEC 0969586 - 709	
1306	1/26/2012	M. Chandarana email to all re RDLFP & RDLFOF Investor Sheet - December 2011	RDLC-SEC 134772	
1307	1/31/2012	Pluris Valuation Data	RDLC-SEC 001556	Unreliable
1308	1/31/2012	RD Legal Monthly Data	RDLC-SEC 467288	
1309	1/31/2012	January 2012 RDLFOF Investor Sheet	RDLC-SEC 940114	
1310	1/31/2012	January 2012 RDLFP Investor Sheet	RDLC-SEC 940115	
1311	2/6/2012	R. Dersovitz email to I. Zatta, R. Rowella, A. Hirsch re FW: settled case facility with attachments - Freeman Presentation Litigation Receivables Opportunity and RD Legal Capital Firm Presentation	SECLIT-EPROD-000274550 - 569	
1312	2/7/2012	S. Perles email to R. Dersovitz	RDLC-SEC 334716	
1313	2/9/2012	K. Mallon meeting invitation to R. Dersovitz, R. Rowella, K. Mallon, M. Chandarana, R. Matos re meeting with D. Dent and D. Backens	RDLC-SEC 0952861	
1314	2/13/2012	Dennis Schall, Marcum email to D. Backens; cc L. Zatta and earlier emails re Auditor Confirmation	SECLIT-EPROD-000714969 - 971	
1315	2/13/2012	Mike Lee email to D. Backens and earlier emails re Auditor Confirmation	SECLIT-EPROD-000715562 - 564	
1316	2/13/2012	R. Dersovitz email to S. Gumins and earlier emails re no subject	(None provided)	
1317	2/14/2012	R. Dersovitz email to A. Hirsch re no subject with attachment - Judgment 9.7.pdf	SECLIT-EPROD-001278166 - 190	
1318	2/16/2012	C. Tavel email to Phillip Laroche; cc R. Dersovitz, L. Zatta re Gregory & Swapp Field Examination with attachment - Gregory Swapp spreadshee	RDLC-SEC 932607 -609 and 10 pp	
1319	2/17/2012	R. Rowella email to A. Ishimaru, P. Craig re Follow up to our call with attachment	SECLIT-EPROD-000720847 - 849	

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1320	2/21/2012	K. Markovic email to A. Hirsch; cc RD re Revised RDLF Special Op Term Sheet 2012_02_21 (attached)	SECLIT-EPROD-000313210 - 213	
1321	2/23/2012	M. Chandarana email to D. Backens and earlier emails re RD Legal Capital - Lotus notes	RDLC-SEC 0974468 - 470	
1322	2/24/2012	M. Chandarana email to D. Backens and earlier emails re Wiss on Lotus	RDLC-SEC 0974464 - 465	
1323	2/28/2012	K. Mallon email to N. Doubleday; cc Dave at Certis Capital, R. Rowella, M. Chandarana re RD Legal Capital - Subscription Documents with attachments	RDLC 0969459 - 581	
1324	2/28/2012	02.28.12 Citibank Temporary Limit Increase	RDLC-SEC 940111	Unreliable
1325	2/29/2012	Pluris Valuation Data	RDLC-SEC 001564	Unreliable
1326	2/29/2012	RD Legal Monthly Data	RDLC-SEC 340036	
1327	2/29/2012	February 2012 RDLFOF Investor Sheet	RDLC-SEC 940118	
1328	2/29/2012	February 2012 RDLFP Investor Sheet	RDLC-SEC 940119	
1329	3/1/2012	R. Dersovitz email to K. Markovic, A. Hirsch re non subject with attachment - Draft III RDLF Special OpTerm Sheet 2012_03_01.docx	SECLIT-EPROD-000365999 - 6003	
1330	3/2/2012	K. Mallon email to D. Backens; cc R. Rowella, Kevin Regan and earlier emails re Client Meeting Questions	SECLIT-EPROD-000715317 - 321	
1331	3/7/2012	R. Dersovitz email to T. Lowe; cc R. Rowella, M. Chandarana, L. Zatta re information needed with attachment	RDLC-SEC 701343 - 345	
1332	3/9/2012	M. Chandarana email to T. Lowe; cc R. Rowella re RD Legal Capital DDQ with attachment	RDLC-SEC 0974378 - 393	
1333	3/9/2012	M. Chandarana email to J. Burrow and earlier emails re More Money from Hogan with attachments	RDLC-SEC-1007093 - 218	
1334	3/12/2012	P. Craig email to R. Dersovitz, R. Rowella, L. Zatta; cc S. Gumins and earlier emails re RD Legal questions (part 2)	RDLC-SEC 029428 - 431	
1335	3/13/2012	T. Lowe email to R. Dersovitz, R. Rowella and earlier emails re information needed	RDLC-SEC 0956150 - 152	
1336	3/13/2012	L. Zatta email to D. Osborn; cc R. Dersovitz and earlier emails re Recent activity	RDLC-SEC 1006682	Unreliable
1337	3/17/2012	T. Lowe email to R. Dersovitz and earlier emails re information needed	RDLC-SEC 0956144 - 146	
1338	3/19/2012	R. Dersovitz email to A. Hirsch; cc K. Markovic, A. Hirsch re How old is Perles?	SECLIT-EPROD-000365995 - 996	Unreliable
1339	3/20/2012	P. Craig email to S. Gumins, A. Ishimaru and earlier emails re RD Legal	SECLIT-EPROD-000050636 - 637	
1340	3/28/2012	L. Zatta email to Precilla Alcantara, Paul Weller re Asset Update with attachment - schneier.Judges Jones and Gorenstein.assets are blockec	RDLC-SEC 343110 - 116	
1341	3/28/2012	Fay Schedule A-6 (March 2012)	SECLIT-EPROD000719363-71	
1342	3/28/2012	R. Dersovitz email to A. Ishimaru; cc P. Craig and earlier emails re Contemplated Revisions	SECLIT-EPROD-000720766 - 846	
1343	3/30/2012	S. Geraci email response to M. Chandarana email to all re RDLFP & RDLFOF Investor Sheet - February 2012	RDLC-SEC 0962871 - 872	
1344	3/31/2012	Pluris Valuation Data	RDLC-SEC 001572	Unreliable
1345	3/31/2012	RD Legal Monthly Data	RDLC-SEC 339920	
1346	3/31/2012	RD Legal Due Diligence Questionnaire	RDLC-SEC 665141 - 155	
1347	3/31/2012	RD Legal Funding Partners, LP & RD Legal Funding Offshore Fund, Ltd. DDQ - March 2012	RDLC-SEC 745339 - 353	
1348	3/31/2012	Independent Accountant's Report on Applying Agreed Upon Procedures 1Q2012	RDLC-SEC 928422	Irrelevant
1349	3/31/2012	03-31-2012- Wiss & Co. AUP Report	RDLC-SEC 940141	Irrelevant; Unreliable
1350	3/31/2012	March 2012 RDLFOF Investor Sheet	RDLC-SEC 940183	
1351	3/31/2012	March 2012 RDLFP Investor Sheet	RDLC-SEC 940184	
1352	3/31/2012	Summary of portfolio statistics for RDLFP & FDLFOF	SEC Investigative Exhibit 60	
1353	4/11/2012	R. Dersovitz email response to P. Craig; cc L. Zatta, R. Rowella, A. Ishimaru re follow-up to March 27 meeting	RDLC-SEC 091324 - 325	
1354	4/12/2012	A. Hirsch email to A. Ishimaru; cc P. Craig, R. Dersovitz, Paradigm Consulting Services and earlier emails re follow-up to March 27 meeting	SECLIT-EPROD-000050161 - 162	
1355	4/13/2012	L. Zatta email to R. Dersovitz, T. Lowe; cc M. Chandarana, R. Rowella and earlier emails re redemption	RDLC-SEC 0965395 - 398	
1356	4/16/2012	Email from R. Dersovitz to investors about Iran	RDLC-SEC 091299	
1357	4/16/2012	M. Chandarana email to B. Beckers re RDLFP & RDLFOF Investor Sheet - February 2012	RDLC-SEC 0986880 - 883	
1358	4/16/2012	L. Zatta email to Adam Windwer re Audit with attachment - schneier.Judges Jones and Gorenstein.assets are blocked	RDLC-SEC 342784	
1359	4/16/2012	R. Dersovitz email to L. Zatta, R. Rowella, K. Markovic, A. Hirsch; cc P. Kessinich, S. Gumins, T. Lowe, J. Juchault, M. Kannaka, Y. Kumagai, T. DeClemente, F. Tripoli re Iran Sanctions with attachments	RDLC-SEC 1006348 - 373	
1360	4/17/2012	RD Legal Administration email to Millennium Trust and B. Beckers; cc M. Chandarana, R. Rowella, L. Nahabedian, RD Legal Administration re RD Legal Funding Offshore Fund, Ltd. - Welcome Package with attachments	RDLC-SEC 0965799 - 803	
1361	4/17/2012	K. Mallon email to S. Geraci; cc R. Rowella, L. Zatta, M. Chandarana re Confidentiality Agreement with attachments	RDLC-SEC 334211 - 216	
1362	4/17/2012	RD Legal email to S. Geraci re RD Legal Capital - Account Createc	RDLC-SEC 923415	
1363	4/18/2012	D. Dent email to R. Dersovitz, R. Rowella re Looking for More Good Income Funds	RDLC-SEC 0956101	
1364	4/19/2012	K. Mallon email to S. Geraci and earlier emails re Kevin Regan - legalcapital, L. Zatta re Confidentiality Agreement	RDLC-SEC 0989678 - 680	
1365	4/23/2012	D. Dent email to R. Dersovitz and earlier emails re Iran	RDLC-SEC 311230 - 231	
1366	4/23/2012	D. Dent email to R. Dersovitz and earlier emails re Iran	SECLIT-EPROD-000412002 - 003	

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1367	4/24/2012	P. Laroche email to D. Osborn; cc R. Dersovitz, L. Noonan re Memo clarification - ONJ	RDLC-SEC 1005504	
1368	4/26/2012	S. Perles email to R. Dersovitz re: Section 503	RDLC-SEC 534447	
1369	4/27/2012	P. Cummings email to All; cc M. Chandarana, L. Zatta re 2011 Audited Financials - RD Legal Funding Offshore Fund, LTD with attachments	RDLC-SEC 1005714 - 739	Unreliable
1370	4/27/2012	P. Cummings email to All; cc M. Chandarana, L. Zatta re 2011 Audited Financials - RD Legal Funding Partners, LP with attachments	RDLC-SEC 1005740 - 763	Unreliable
1371	4/30/2012	Pluris Valuation Data	RDLC-SEC 001581	Unreliable
1372	4/30/2012	Confidential Private Offering Memorandum of RD Legal Funding Partners, LP	RDLC-SEC 084034 - 067	
1373	4/30/2012	RD Legal Monthly Data	RDLC-SEC 464070	
1374	4/30/2012	April 2012 RDLFOF Investor Sheet	RDLC-SEC 940204	
1375	4/30/2012	April 2012 RDLFP Investor Sheet	RDLC-SEC 940205	
1376	5/1/2012	K. Mallon email to D. Backens; cc R. Rowella re RD Legal Financials with attachment	RDLC-SEC 0994376 - 400	
1377	5/2/2012	K. Mallon email to D. Dent, D. Backens; cc R. Rowella re Portfolio Concentration for RD Legal with attachment	RDLC-SEC 0994175 - 177	
1378	5/4/2012	Pace Kessenich email to R. Dersovitz and earlier emails re Iran Sanctions	RDLC-SEC 029237 - 239	
1379	5/4/2012	Emails between Mr. Dersovitz and Mr. Kessenich	SEC Investigative Exhibit 15	
1380	5/15/2012	K. Mallon email to D. Dent; cc L. Zatta, R. Rowella and earlier emails re IRA Funds with attachments	RDLC-SEC 0991867 - 899	
1381	5/17/2012	K. Mallon email to D. Dent; cc R. Rowella, M. Chandarana, D. Backens and earlier emails re IRA Funds with attachments	RDLC-SEC 0987464 - 599	
1382	5/17/2012	A. Hirsch email to R. Dersovitz re: Letter to Plaintiffs Peterson Case	RDLC-SEC 253051 - 056	
1383	5/17/2012	P. Cummings email to All; cc L. Zatta, M. Chandarana re 2011 Audited Financials - RD Legal Funding Offshore Fund, LTD with attachments	RDLC-SEC 1005688 - 713	Unreliable
1384	5/19/2012	R. Dersovitz email to J. Genovesi, A. Hirsch, L. Zatta; cc B. Laraja re Letter to Plaintiffs Peterson Case with attachment RD Legal Letterhead Peterson Plaintiff Fee Acceleration (RD Comments)	SECLIT-EPROD-000353505 - 512	
1385	5/20/2012	RD Legal memo re Novartis Exposure	RDLC-SEC 066072 - 073	Unreliable
1386	5/20/2012	A. Ishimaru email response to P. Craig re RD Legal	SECLIT-EPROD-000050167	Unreliable
1387	5/23/2012	J. Genovesi email to S. Perles and T. Fay attaching draft letters to Peterson plaintiffs	RDLC-SEC 253218 - 220	
1388	5/23/2012	K. Mallon email to Wenjing Chen, D. Backens; cc Patrick Cummings, R.	RDLC-SEC 346276 - 385	
1389	5/24/2012	R. Dersovitz email to B. Laraja; cc A. Hirsch, K. Markovic, L. Zatta, R. Rowella; bcc P. Craig, S. Gumins, J. Robinson, Max Levine forwarding S. Perles email re RM's Iran sanctions floor remarks video	SECLIT-EPROD-000365896	
1390	5/25/2012	K. Mallon email response to S. Geraci; cc R. Rowella, L. Zatta re Data on Investors	RDLC-SEC 0985845 - 846	
1391	5/26/2012	R. Dersovitz email to P. Craig and earlier emails re Peterson v. Iran	SECLIT-EPROD-000050170	
1392	5/26/2012	R. Dersovitz email to P. Craig and earlier emails re Peterson v. Iran	SECLIT-EPROD-000050171 - 172	
1393	5/26/2012	R. Dersovitz email to P. Craig and earlier emails re Peterson v. Iran	SECLIT-EPROD-000050174 - 175	
1394	5/26/2012	R. Dersovitz email to P. Craig re no subject	SECLIT-EPROD-000050176	
1395	5/29/2012	K. Mallon email response to S. Geraci; cc R. Rowella, M. Chandarana re Data on Investors with Kelly attachments	RDLC-SEC 0962224 - 334	
1396	5/29/2012	K. Mallon 1:16 pm email response to S. Geraci; cc R. Rowella, M. Chandarana re Data on Investors with Donohoo attachments	RDLC-SEC 0968727 - 842	
1397	5/29/2012	K. Mallon 10:08 am email response to S. Geraci; cc R. Rowella, M. Chandarana re Data on Investors with Geraci attachments	RDLC-SEC 333476 - 585	
1398	5/29/2012	K. Mallon 2:00 pm email response to S. Geraci; cc R. Rowella re Data on Investors	RDLC-SEC 0989321 - 322	
1399	5/30/2012	RD Legal Capital, LLC Novartis Memo	RDLC-SEC 055482 - 583	Unreliable
1400	5/30/2012	05.30.12 Temporary Limit Increase to Novartis Exposure Memc	RDLC-SEC 940210	Unreliable
1401	5/31/2012	Pluris Valuation Data	RDLC-SEC 001589	Unreliable
1402	5/31/2012	Email chain re Perles funding	RDLC-SEC 066820	
1403	5/31/2012	RD Legal Monthly Data	RDLC-SEC 339636	
1404	5/31/2012	May 2012 RDLFOF Investor Sheet	RDLC-SEC 940243	
1405	5/31/2012	May 2012 RDLFP Investor Sheet	RDLC-SEC 940244	
1406	6/5/2012	L. Zatta email to P. Craig; cc R. Dersovitz, A. Ishimaru, M. Chandarana, R. Rowella re Iran exposure	SECLIT-EPROD-000050177 - 178	
1407	6/5/2012	P. Cummings email to M. Chandarana and earlier emails re 2011 Audited Financials - RD Legal Funding Partners, LP with attachments	RDLC-SEC 1005541 - 642	
1408	6/8/2012	Email between R. Dersovitz and Tom Condon	RDLC-SEC 026394	
1409	6/8/2012	P. Craig email to R. Dersovitz and earlier emails re Iran exposure	RDLC-SEC-265749 - 751	
1410	6/10/2012	R. Dersovitz email to A. Ishimaru; cc L. Zatta, P. Craig, M. Chandarana, R. Rowella and earlier emails re Iran exposure	SECLIT-EPROD-000050211 - 216	
1411	6/18/2012	M. Chandarana email to T. Lowe; cc R. Dersovitz and earlier emails re RD Legal Funding Partners LP Subscription Documents with attachment	RDLC-SEC 665030 - 155	
1412	6/21/2012	R. Dersovitz email to Andrew Clark re vm with attachment - Beirut Overview 2012-06-21	2 pp.	
1413	6/25/2012	T. Fay email to R. Dersovitz re: SDNY marines litigation	RDLC-SEC 456805	

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1414	6/26/2012	Fay Schedule A-7 (Peterson June 2012)	SECLIT-EP EPROD000719051-60	
		Schedule A-1 to Master Agreement and Sale Agreement between Thomas F. Fay and		
1415	6/26/2012	Fay Kaplan Law, P.A., Assignor, and RD Legal Funding, LLC, Assignee	SECLIT-EPROD-001208811 - 821	
1416	6/27/2012	Security Agreement Regarding Peterson Funding Transactions	RDLC-SEC 097666	Irrelevant
1417	6/29/2012	Security Agreement Regarding Petersen Funding Transactions	RDLC-SEC 076842	Irrelevant
		M. Chandarana email to B. Beckers; cc L. Zatta re Update on RD Legal Funding		
1418	6/29/2012	Offshore Fund, Ltd.	RDLC-SEC 0974018	
		Security Agreement Regarding Peterson Funding Transactions between The Perles		
1419	6/29/2012	Law Firm and RD Legal Funding Partners, LP	RDLC-SEC 097796 - 802	Irrelevant
		Fay Security Agreement (Peterson 6-29-12)		
1420	6/29/2012		SECLIT-EPROD000719044-50	Irrelevant
		M. Chandarana email to S. Dabbah; cc L. Zatta re Update on RD Legal Funding Offshore		
1421	6/29/2012	Fund, Ltd.	RDLC-SEC-0974019	
1422	6/30/2012	Pluris Valuation Data	RDLC-SEC 001597	Unreliable
		Independent Accountant's Report on Applying Agreed Upon Procedures 2Q2012		
1423	6/30/2012		RDLC-SEC 109718	Irrelevant
1424	6/30/2012	RD Legal Monthly Data	RDLC-SEC 339481	
1425	6/30/2012	06-30-2012 Wiss & Co. AUP Report	RDLC-SEC 940269	Irrelevant; Unreliable
1426	6/30/2012	June 2012 RDLFOF Investor Sheet	RDLC-SEC 940343	
1427	6/30/2012	June 2012 RDLFP Investor Sheet	RDLC-SEC 940344	
		Independent Accountant's Report on Applying Agreed-Upon Procedures for RD Legal		
1428	6/30/2012	Funding, LLC prepared by Wiss & Co.	SECLIT-EPROD-000847285-293	Irrelevant
		J. Riley email to M. Chandarana; cc C. Riley, D. Friedman and earlier emails re		
1429	7/5/2012	Meeting with Ron	RDLC-SEC 0962113 - 114	
		T. Lowe email to R. Dersovitz re Update on RD Legal Funding Partners, LP		
1430	7/9/2012		RDLC-SEC 0955767- 768	
		P. Cummings email to RD Legal Investors, M. Chandarana re RD Legal Funding		
1431	7/10/2012	Offshore Fund - 1st Quarter 2012 AUP Report with attachment	RDLC-SEC 1005664 - 675	Unreliable
		P. Cummings email to RD Legal Investors, M. Chandarana re RD Legal Funding		
1432	7/10/2012	Partners, LP - 1st Quarter 2012 AUP Report with attachment	RDLC-SEC 1005676 - 687	Unreliable
		Kelly Yeun email to L. Nahabedian; cc RD Legal Admin, Treasury Department, L. Zatta		
1433	7/11/2012	and earlier emails re wire advices_ Woodfield & Domestic discretionary distributions	RDLC-SEC 1006622 - 658	
		K. Mallon email to B. Beckers re Monthly Return and earlier emails		
1434	7/16/2012		RDLC-SEC 0984374 - 377	Unreliable
		RD Legal Admin email to P. Craig; cc M. Chandarana, RD Legal Admin re RD Legal		
1435	7/16/2012	Funding Partners, LP - Distribution Confirmation with attachment	SECLIT-EPROD-000050291 - 292	
		P. Laroche email to A. Hirsch; cc R. Dersovitz, L. Zatta re Information regarding Fay		
1436	7/17/2012	for A-6 with attachment - Offshore Fay Contracts for IC - 07.12.12.xlsx	SECLIT-EPROD-000354053 - 055	
		Drew Derrick email to M. Chandarana; cc P. Cummings, T. Hutchinson re Millennium		
1437	7/18/2012	Trust Company - Notice of Wire Transfer with attachment	RDLC-SEC 0966604 - 606	
1438	7/27/2012	Schedule A-8 to Master Agreement between Perles and RDLFF	RDLC-SEC 097786	
1439	7/31/2012	Pluris Valuation Data	RDLC-SEC 001603	Unreliable
1440	7/31/2012	RD Legal Monthly Data	RDLC-SEC 339474	
1441	7/31/2012	July 2012 RDLFOF Investor Sheet	RDLC-SEC 940360	
1442	7/31/2012	July 2012 RDLFP Investor Sheet	RDLC-SEC 940361	
1443	8/1/2012	Investment Management Agreement	RDLC-SEC 940212	
		Investment Management Agreement between RD Legal Funding Offshore Fund, Ltd.,		
1444	8/1/2012	Oqier Trustees (Cayman) Limited, and RD Legal Capital, LLC	SECLIT-EPROD-000705337 - 353	
		P. Craig email to R. Dersovitz and earlier emails re Iran Threat Reduction and Syria		
1445	8/2/2012	Human Rights Act	RDLC-SEC 029167 - 168	
		R. Dersovitz email to S. Perles with attachment		
1447	8/2/2012		RDLC-SEC 872498 - 541	
		P. Craig email to R. Dersovitz and earlier emails re Iran Threat Reduction and Syria		
1448	8/7/2012	Human Rights Act	RDLC-SEC 029169 - 170	
1449	8/9/2012	D. Dent email to R. Dersovitz and earlier emails re thanks for the visit	RDLC-SEC 0955617	
1450	8/9/2012	Registration Certificate	RDLC-SEC 940580	
		P. Craig email to R. Dersovitz and earlier emails re Iran Sanctions Legislation		
1451	8/11/2012		SECLIT-EPROD-000050785 - 788	
		RD Legal Capital, LLC Alpha Generation and Process		
1452	8/15/2012		RDLC-SEC 173192 - 212	
		Summary of Investment Opportunity, dated 8/15/2012 (two page marketing sheet)		
1453	8/15/2012		SEC Investigative Exhibit 58	
		Alpha Generation & Process Presentation		
1454	8/15/2012		SEC Investigative Exhibit 107	
		Reed Smith - Analysis of the Peterson v. Islamic Republic of Iran Turnover Litigation		
1455	8/17/2012		RDLC-SEC 624656 - 686	
		Reed Smith - Analysis of the Priority of Claimants in the Peterson v. Islamic Republic o		
1456	8/17/2012	Iran Turnover Litigation	RDLC-SEC 638182 - 186	
		Reed Smith - Analysis of the Priority of Claimants in the Peterson v. Islamic Republic o		
1457	8/17/2012	Iran Turnover Litigation	RDLC-SEC 654801	
1458	8/20/2012	Perles - Schedule A-9 (4)	RDLC-SEC 097803	
		M. Chandarana email to T. Lowe; cc R. Dersovitz and earlier emails re new investors		
1459	8/20/2012	with attachments	RDLC-SEC 735859 - 984	
		J. Riley email to D. Friedman, J. Pesca, C. Gilbreath, C. Riley, D. McKee and earlier		
1460	8/21/2012	emails re FW: Is RDLFP open for additional investment?	SECLIT-EPROD-000718717 - 718	
		L. Zatta email to P. Craig; cc R. Dersovitz, A. Ishimaru, M. Chandarana and earlier		
1461	8/22/2012	emails re monthly concentration report with attachment	SECLIT-EPROD-000050314 - 316	
		R. Dersovitz email to K. Markovic (cc A. Hirsch) with attachment		
1462	8/23/2012		RDLC-SEC 173280, RDLC-SEC173281	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1463	8/23/2012	G. Takahashi email to M. Chandarana	RDLC-SEC 331530 - 533	
1464	8/23/2012	L. Zatta email to R. Dersovitz, P. Craig; cc I Asami, M. Chandarana and earlier emails re Monthly Concentration Report	SECLIT-EPROD-000050323 - 325	
1465	8/23/2012	L. Zatta email to R. Dersovitz; cc A. Ishimaru, M. Chandarana and earlier emails re monthly concentration report	RDLC-SEC-0968703 - 706	
1466	8/24/2012	K. Markovic email to R. Dersovitz, A. Hirsch, re to be reviewed with attachments - RD Legal Capital Firm Presentation 081512.pdf and Conference Calendar.slsx	SECLIT-EPROD-000277461 - 482	
1467	8/26/2012	T. Lowe email to M. Chandarana re new investors and earlier emails	RDLC-SEC 0961892 - 895	
1468	8/27/2012	R. Dersovitz email to K. Markovic	RDLC-SEC 238230	Irrelevant
1469	8/28/2012	T. Lowe email to M. Chandarana re Name as Reference	RDLC-SEC 0961887 - 888	
1470	8/28/2012	K. Markovic email to A. Hirsch	RDLC-SEC 175686	
1471	8/29/2012	K. Markovic email to M. Chanaranda and K. Mallon	RDLC-SEC 922948 - 949	
1472	8/31/2012	Pluris Valuation Data	RDLC-SEC 001612	Unreliable
1473	8/31/2012	J. Riley email to M. Chandarana; cc R. Dersovitz, L. Zata, K. Markovic and earlier emails re Additional allocation with attachments	RDLC-SEC 0961838 - 841	
1474	8/31/2012	M. Chandarana email to T. Lowe re Name as Reference	RDLC-SEC 0973667	
1475	8/31/2012	RD Legal Monthly Data	RDLC-SEC 339293	
1476	8/31/2012	August 2012 RDLFOF Investor Sheet	RDLC-SEC 940408	
1477	8/31/2012	August 2012 RDLFP Investor Sheet	RDLC-SEC 940409	
1479	9/1/2012	September 2012 DDQ	SEC Investigative Exhibit 111	
1480	9/4/2012	Kat's confidentiality agreement	SEC Investigative Exhibit 106	
1481	9/5/2012	K. Markovic email to R. Dersovitz	RDLC-SEC 219948	
1482	9/18/2012	K. Markovic email to R. Dersovitz and A. Hirsch with attachment	RDLC-SEC 173162	
1483	9/18/2012	K. Markovic email to R. Dersovitz, A. Hirsch; cc M. Chandarana, K. Mallon re your comments pls . . . with attachment - RDLegal1pg.pptx	SECLIT-EPROD-000274347 - 348	
1484	9/19/2012	S. Gottlieb email to K. Markovic re: Alpha gen	RDLC-SEC 175626	
1485	9/19/2012	K. Markovic email to S. Gottlieb requesting review of marketing materials	RDLC-SEC 175630	
1486	9/19/2012	K. Markovic email to S. Gottlieb requesting review of marketing materials	RDLC-SEC 176137	
1487	9/19/2012	K. Markovic email to S. Gottlieb attaching marketing materials for his review	RDLC-SEC 176150, RDLC-SEC 176151	
1488	9/21/2012	K. Markovic email response to K. Mallon; cc RD Legal Admin re certis referral program	RDLC-SEC-0969582 - 583	
1489	9/25/2012	J. Riley email to M. Chandarana and earlier emails re Additional allocation	RDLC-SEC 0331246 - 249	
1490	9/28/2012	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding Partners, LP - 2nd Quarter 2012 AUP Report with attachment	SECLIT-EPROD-000050326 - 335	Unreliable
1491	9/28/2012	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding Offshore Fund - 2nd Quarter 2012 AUP Report with attachment	RDLC-SEC 1005654 - 663	Unreliable
1492	9/30/2012	RD Legal Funding Partners, LP and RD Legal Funding Offshore Fund, Ltd. Due Diligence Questionnaire	15 pp.	
1493	9/30/2012	Pluris Valuation Data	RDLC-SEC 001621	Unreliable
1494	9/30/2012	Independent Accountant's Report on Applying Agreed Upon Procedures 3Q2012	RDLC-SEC 045635	Irrelevant; Unreliable
1495	9/30/2012	RD Legal Monthly Data	RDLC-SEC 339234	
1496	9/30/2012	09-30-2012 Wiss & Co. AUP Report	RDLC-SEC 940410	Irrelevant; Unreliable
1497	9/30/2012	September 2012 RDLFOF Investor Sheet	RDLC-SEC 940460	
1498	9/30/2012	September 2012 RDLFP Investor Sheet	RDLC-SEC 940461	
1499	9/30/2012	Confidential RD Legal Funding Partners, LP and RD Legal Funding Offshore Fund, Ltd. Due Diligence Questionnaire	SECLIT-EPROD-000701921 - 935	
1500	10/2/2012	Emails between Mr. Dersovitz and Mr. Young	RDLC-SEC 026354	
1501	10/3/2012	P. Craig email to M. Chandarana and earlier emails re RD Legal Capital with attachment	SECLIT-EPROD-000050655 - 657	
1502	10/9/2012	Emails between Mr. Dersovitz and Mr. Young	RDLC-SEC 026287	
1503	10/12/2012	R. Dersovitz email to P. Craig; cc K. Markovic re Participation Agreement with attachment	SECLIT-EPROD-000050398 - 458	
1504	10/18/2012	K. Markovic email response to N. Doubleday; cc K. Mallon re New referral clients	RDLC-SEC 0969139	
1505	10/19/2012	R. Dersovitz email to K. Mallon, L. Zatta, K. Markovic and earlier emails re New Investments	RDLC-SEC 0961603 - 604	
1506	10/24/2012	M. Chandarana email to T. Hutchinson re RD Legal Investment - Carolyn Limerick with attachments	RDLC-SEC 0990586 - 591	
1507	10/31/2012	Pluris Valuation Data	RDLC-SEC 001630	Unreliable
1508	10/31/2012	RD Legal Monthly Data	RDLC-SEC 304106	
1509	10/31/2012	October 2012 RDLFOF Performance Report	RDLC-SEC 940473	
1510	10/31/2012	October 2012 RDLFP Performance Report	RDLC-SEC 940474	
1511	11/1/2012	Transcript of conversation with K. Markovic, R. Dersovitz and Cobblestone	SEC Investigative Exhibit 116	
1512	11/1/2012	Audio of SEC Investigative Exhibit 116	SEC Investigative Exhibit 117	
1513	11/3/2012	R. Dersovitz email to K. Markovic; cc A. Hirsch, L. Zatta re NDA	SECLIT-EPROD-000320345 - 352	
1514	11/6/2012	K. Markovic email to T. Lowe with attachment	RDLC-SEC 0991342, RDLC-SEC 0991344, RDLC-SEC 0991345,	
1515	11/6/2012	M. Chandarana email to All re RD Legal Capital Overview - September 2012 with attachment	RDLC-SEC 916476 - 477	Unreliable
1516	11/8/2012	A. Hirsch email to R. Dersovitz re: drafting FAQ	RDLC-SEC 173126 - 127	

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1517	11/8/2012	A. Hirsch email to R. Dersovitz; cc K. Markovic, A. Hirsch re FAQ Beginnings with attachment - RD Legal FAQ Sheet	SECLIT-EPROD-000274307 - 312	
1518	11/17/2012	R. Dersovitz email to K. Markovic, A. Hirsch re FAQ with attachment - RD Legal FAQ Sheet 2012 11 15 rev 1 (rd comments)	SECLIT-EPROD-000274853 - 858	
1519	11/19/2012	L. Budzynski email to S. Geraci, lps@mtrustcompany.com; cc M. Chandarana, RD Legal Admin re RD Legal Funding Partners, LP - Welcome Materials with attachments	RDLC-SEC 0965795 - 797	
1520	11/20/2012	A. Hirsch email to R. Dersovitz re: FAQ revisions	RDLC-SEC 173038 - 039	
1521	11/20/2012	R. Dersovitz email to A. Hirsch; cc K. Markovic re FAQ	SECLIT-EPROD-000276700 - 701	
1522	11/21/2012	A. Hirsch email to R. Dersovitz with revisions to FAQ	RDLC-SEC 176072, RDLC-SEC 176073	
1523	11/27/2012	K. Markovic email to S. Gottlieb and others	RDLC-SEC 173003, RDLC-SEC 173005	
1524	11/27/2012	K. Markovic email to S. Gottlieb, A. Hirsch and others requesting review of marketing materials	RDLC-SEC 176055, RDLC-SEC 176056	
1526	11/30/2012	Pluris Valuation Data	RDLC-SEC 001640	Unreliable
1527	11/30/2012	RD Legal Monthly Data	RDLC-SEC 303744	
1530	12/1/2012	A. Hirsch email to K. Markovic re: FAQ	RDLC-SEC 175468	
1531	12/1/2012	A. Hirsch email to K. Markovic; cc A. Hirsch re FAQ	SECLIT-EPROD-000276652 - 653	
1532	12/3/2012	K. Markovic email to T. Lowe and earlier emails re request for a call with attachments	RDLC-SEC 237847 - 868	
1533	12/3/2012	A. Hirsch email to K. Markovic; cc R. Dersovitz, A. Hirsch re Final FAQ Please do not make any changes with attachments - RD Legal FAQ Sheet Final 2012.docx and RD Legal FAQ Sheet Final 2012.pdf	SECLIT-EPROD-000280002 - 014	
1534	12/3/2012	R. Dersovitz email to A. Hirsch, K. Markovic re Final FAQ Please do not make any changes	SECLIT-EPROD-000380456	
1535	12/4/2012	R. Dersovitz email to A. Hirsch re A few things	SECLIT-EPPROD-000274830 - 831	
1536	12/7/2012	Steps Involved in the Process of Funding Alty Legal Fees on Settled Case:	RDLC-SEC 046704	
1537	12/10/2012	M. Chandarana email to K. Markovic; cc A. Hirsch re Third Batch of Due Diligence Questions with attachment - Third Round of Final Due Diligence Questions	SECLIT-EPROD-000272435 - 437	
1538	12/11/2012	M. Chandarana email to T. Hutchinson; cc G. Cook re Randall & Marlene Steele with attachment	RDLC-SEC 0994427 - 428	
1539	12/12/2012	T. Lowe email to R. Dersovitz; cc S. Barber re investment	RDLC-SEC 0954181	
1540	12/13/2012	S. Gottlieb email to K. Markovic with minor revisions to marketing presentator	RDLC-SEC 175434	
1541	12/13/2012	S. Gottlieb email to K. Markovic re marketing materials	RDLC-SEC 175921	
1542	12/14/2012	K. Markovic email to A. Hirsch attaching Alpha Gen	RDLC-SEC 175876 - 898	
1543	12/21/2012	J. Riley email to M. Chandarana and earlier emails re Name as Reference	RDLC-SEC 0961639 - 641	
1544	12/21/2012	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding Offshore Fund - 3rd Quarter 2012 AUP Report with attachmen	RDLC-SEC 1005523 - 535	Unreliable
1545	12/31/2012	Net Revenue and Expenses From Operation of Legacy Funds 2011	1 pg.	Unreliable
1546	12/31/2012	Alpha Generation and Process presentator	21 pp.	
1547	12/31/2012	Pluris Valuation Data	RDLC-SEC 001650	Unreliable
1548	12/31/2012	RD Legal Funding Offshore Fund, LTD. 2012 year-end financials	RDLC-SEC 002227	Irrelevant
1549	12/31/2012	RD Legal Funding Offshore Fund, Ltd. Financial Statements	RDLC-SEC 002227 - 256	Irrelevant
1550	12/31/2012	RDLFP 2012 Financial Statements	RDLC-SEC 002257	Irrelevant
1551	12/31/2012	12-31-2012 RDLFP Audited Financial Statements	RDLC-SEC 002257	Irrelevant
1552	12/31/2012	RD Legal Funding Partners, LP Financial Statements for 2012	RDLC-SEC 063481 - 507	Irrelevant
1553	12/31/2012	Alpha Generation and Process Presentation (December 2012)	RDLC-SEC 088569	
1554	12/31/2012	RD Legal Full Portfolio Data	RDLC-SEC 1004767	Unreliable
1555	12/31/2012	RD Legal Monthly Data	RDLC-SEC 303404	
1556	12/31/2012	RDLC DDQ (December 2012)	RDLC-SEC 642268	
1557	12/31/2012	4Q2012 RDLC Portfolio Statistics	RDLC-SEC 940534	
1558	12/31/2012	Alpha Generation and Process Presentation (December 2012)	SECLIT-EPROD-000000879	
1559	12/31/2012	Memorandum from Marcum re RD Legal Funding Partners, LP - Value of Loan Portfolio as of December 31, 2012	SECLIT-EPROD-000033005	Unreliable
1560	12/31/2012	RD Legal Funding Offshore Fund, Ltd. Financial Statements FYE December 31, 2012	SECLIT-EPROD-000104481 - 510	Irrelevant
1561	12/31/2012	RD Legal Funding Partners, LP Financial Statements	SECLIT-EPROD-000704782 - 808	Irrelevant
1562	12/31/2012	RD Legal Funding Offshore Fund, Ltd. Financial Statements	SECLIT-EPROD-000704834 - 863	Irrelevant
1563	12/31/2012	Dersovitz 1040 Tax Return for 2012	RDLC-SEC 1007051	Unreliable
1564	1/1/2013	RD Legal FAQ	SEC Investigative Exhibit 19	
1565	1/7/2013	M. Chandarana email to J. Riley re Meeting with R. Dersovitz with attachment:	RDLC-SEC 0744280	
1566	1/8/2013	N. Doubleday email to R. Dersovitz and earlier emails re no subject	RDLC-SEC 0954103 - 104	
1567	1/8/2013	N. Doubleday email response to R. Dersovitz; cc K. Markovic, M. Chandarana re no subject	RDLC-SEC 0954105	
1568	1/8/2013	J. Riley email to R. Dersovitz re Thanks	RDLC-SEC 0982636	
1569	1/9/2013	N. Doubleday email response to R. Dersovitz re FAQ	RDLC-SEC 0954101 - 102	
1570	1/10/2013	Email from Stifka to Jared Friedberg.	SAM 012544-86	
1571	1/10/2013	J. Riley email to J. Riley; cc C. Riley re Roni Dersovitz meeting notes on 1/8/13	SECLIT-EPROD-000716483 - 484	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1572	1/11/2013	Email chain between A. Meyer, R. Slifka, N. Solomon re Marketing Material Reques	SAM 005653 - 654	
1573	1/11/2013	2:13-cv-00077-JLL-MF, Document 4-1, Filed 1/11/13, Page 2 of 20 Page ID 139	SEC Investigative Exhibit 61	
1574	1/11/2013	2:13-cv-00077-JLL-MF, Document 4, Filed 1/11/13, page 29 of 95, Page ID 71	SEC Investigative Exhibit 62	
1575	1/14/2013	E-mail. From: L. Zatta, To: Eric Liu, Cc: R. Dersovitz with Subject: Valuator	PVA0028600	
1576	1/14/2013	E-mail. From: E. Liu, To: P. LaRoche; cc K. Burdette, L. Zatta re: 10/31/13 tentative report	PVA0033807	
1577	1/14/2013	E. Liu e-mail to L. Zatta, cc E. Robak, R. Dersovitz, P. Laroche, J. Liao and earlier emails re Valuation	PVA0046580	
1578	1/14/2013	M. Chandarana email to K. Markovic and earlier emails re Name as Reference	RDLC-SEC 0961148 - 149	
1579	1/14/2013	K. Markovic email to A. Hirsch; cc R. Slifka re due diligence	RDLC-SEC 170737	
1580	1/14/2013	R. Slifka email to K. Markovic requesting investor/lawyer references	SECLIT-EPROD-000695337, SECLIT-EPROD-000695338	
1581	1/14/2013	K. Markovic email to R. Slifka cc Stefani Fishler re follow up with attachment	RDLC-SEC 1005850 - 851	
1582	1/15/2013	Emails between Mr. Dersovitz and Mr. Cummings	RDLC-SEC 029185	
1583	1/17/2013	P. Wisard email to R. Dersovitz	RDLC-SEC 106123	
1584	1/17/2013	R. Dersovitz email response to S. Gumins re __	RDLC-SEC 0981198 - 199	
1585	1/18/2013	K. Markovic email to R. Slifka; cc M. Chandarana re RD Legal Website	RDLC-SEC 0961605 - 606	
1586	1/18/2013	K. Markovic email to R. Slifka re: website access	SECLIT-EPROD-000695380	
1587	1/18/2013	J. Burrow email to M. Chandarana re RD Legal Capital	RDLC-SEC 1007393 - 394	
1588	1/19/2013	R. Dersovitz email to A. Hirsch re Iran Special Opp	SECLIT-EPROD-000630660 - 661	
1589	1/22/2013	M. Chandarana email to All re RD Legal Capital - 4Q2012 Portfolio Statistics with attachment	RDLC-SEC 103940; RDLC-SEC 132870	Unreliable
1590	1/22/2013	M. Chandarana email to All re RD Legal Capital - 4Q2012 Portfolio Statistics with attachment	RDLC-SEC 132870; RDLC-SEC 103940	Unreliable
1591	1/22/2013	M. Chandarana email to All re RD Legal Capital - 4Q2012 Portfolio Statistics with attachment	RDLC-SEC 1006099 - 100	Unreliable
1592	1/25/2013	M. Chandarana email to J. Burrow and earlier emails re RD Legal Capital - 4Q2012 Portfolio Statistics with attachments	RDLC-SEC 1007441 - 470	
1593	1/26/2013	Email exchange between R. Dersovitz and Randy Slifka	SAM 005716	
1594	1/27/2013	K. Markovic email to Carter and Afsy Pottash; cc R. Dersovitz, R. Slifka re introduction to Carter with attachments	RDLC-SEC 735184	
1595	1/27/2013	Email from K. Markovic to Carter and Afsy Pottash, cc'ing Slifka.	SAM 005718-19	
1596	1/27/2013	Email between K. Markovic, R. Dersovitz, and Cater and Carter Pottash forwarding materials at Slifka's direction.	SAM 005718	
1597	1/27/2013	K. Markovic email to R. Slifka and earlier emails re Follow up with attachments	SECLIT-EPROD-000365442 - 451	
1598	1/30/2013	Email from Pottash to Slifka.	SAM 005807	
1599	1/31/2013	Pluris Valuation Data	RDLC-SEC 001660	Unreliable
1600	1/31/2013	RD Legal Monthly Data	RDLC-SEC 338239	
1601	1/31/2013	RDLC FAQ (January 2013)	SECLIT-EPROD-000000869	
1602	2/1/2013	Email between K. Markovic and George Markovic	RDLC-SEC 088567	
1603	2/1/2013	A. Sinensky email to R. Dersovitz re From Arthur S. (Business related - not Shul stuff) and earlier emails with attachments	RDLC-SEC 0896797 - 825	
1604	2/1/2013	A. Sinensky email to R. Dersovitz re From Arthur S. with attachments - RD Legal Overview, RD Legal Capital Firm Presentation, RD Legal FAC	RDLC-SEC 896797 - 826	
1606	2/1/2013	Code of Ethics	RDLC-SEC 940581	Irrelevant, Immaterial, Unreliable
1607	2/3/2013	K. Markovic email to R. Slifka re Hi K. Markovic with attachment	SECLIT-EPROD-000695524 - 556	
1608	2/4/2013	R. Slifka email to R. Dersovitz and earlier emails re Reed Smith Bios	RDLC-SEC 0982381 - 382	
1609	2/4/2013	R. Dersovitz email to R. Slifka saying Jim Martin (Reed Smith) should be expecting his call	RDLC-SEC-0982381	
1610	2/6/2013	R. Dersovitz email to R. Slifka re Roni Dersovitz has shared RD Legal Peterson Background Summary.pdf with you.	SECLIT-EPROD-000695644	
1611	2/7/2013	K. Markovic invitation to Meeting with Randy Slifka to R. Dersovitz	RDLC-SEC 1005849	
1612	2/8/2013	Email from Eric Liu to P. Laroche	RDLC-SEC 050942	
1613	2/10/2013	A. Hirsch email to R. Dersovitz re: monthly risk management file for investor presentations	RDLC-SEC 252180 - 183	
1614	2/11/2013	M. Chandarana email to A. Sinensky; cc K. Markovic, RD re RE Follow-up with attachments - RD Legal Funding Offshore Fund, Ltd. US Tax Exempt Sub Doc, RD Legal Funding Offshore Fund, Ltd. Non-US Sub Doc, and RD Legal Funding Offshore Fund, Ltd. Confidential Explanatory Memc	SECLIT-EPROD-000023162 - 23241	
1615	2/12/2013	D. Dent email to R. Dersovitz and earlier emails re no subject	SECLIT-EPROD-000400935 - 937	
1616	2/13/2013	Email chain between Marcum and Pluris	PVA0004328	
1617	2/14/2013	S. Perles email to R. Dersovitz re: Peterson litigation	RDLC-SEC 911675	
1618	2/15/2013	A. Hirsch email to R. Dersovitz and others	RDLC-SEC 179237, RDLC-SEC 179241	
1619	2/16/2013	R. Dersovitz email to A. Hirsch; cc K. Markovic re TR-State LOC application	SECLIT-EPROD-000319120 - 123	

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1620	2/17/2013	S. Gottlieb email to K. Markovic with feedback on Alpha gen (compliance suggestions and stylistic edits)	RDLC-SEC 179211, RDLC-SEC 179215	
1621	2/18/2013	R. Dersovitz email to R. Slifka with updates on positive developments in Peterson litigation	RDLC-SEC 0982572	
1622	2/19/2013	Email between K. Markovic and Stuart Samott	SAM_013166	
1623	2/20/2013	S. Gottlieb email to K. Markovic	RDLC-SEC 175348, RDLC-SEC 175350	
1624	2/20/2013	K. Markovic email to S. Gottlieb and A. Hirsch asking for final approval on FAQ	RDLC-SEC 175829 - 830	
1625	2/22/2013	M. Chandarana email to all re RD Legal Capital - Performance update	RDLC-SEC 136064	Unreliable
1626	2/25/2013	Barbara Laria email to C. Tavel; cc R. Dersovitz, J. Genovesi, L. Zata re F&P Zyprexa w- Monsour with attachments - 12-28-2006 Master Settlement Agreement and 3/29/2007 Monsour - Zyprexa Claimant List	RDLC-SEC 934229 -263 and 11 pp.	Irrelevant
1627	2/25/2013	B. Laria email to C. Tavel; cc R. Dersovitz, J. Genovesi, L. Zata re Ferrer & Poirot, GP - Anandia w- The Driscoll Firm with attachments - Driscoll MSA and Avandia F&P Claimant Listing	RDLC-SEC 934349 and 65 pp.	Irrelevant
1628	2/25/2013	P. Craig email to M. Chandarana re redemption notice with attachment	SECLIT-EPROD-000050661 - 662	
1629	2/25/2013	K. Markovic email to R. Dersovitz; cc A. Hirsch re diluting the Marines position	SECLIT-EPROD-000304176	
1630	2/26/2013	R. Dersovitz email response to N. Doubleday re Today's meeting	RDLC-SEC 527690	
1631	2/26/2013	Emil from Slifka to Robert Okun and Glenn August	SAM 000879	Irrelevant; Unreliable
1632	2/26/2013	R. Slifka email to Robert Okun; cc Glenn August re RD Legal with attachments	SECLIT-EPROC-000690313 - 319	Irrelevant; Unreliable
1633	2/26/2013	R. Dersovitz email to P. Craig and earlier emails re redemption	SECLIT-EPROD-000050469 - 470	
1634	2/27/2013	J. Riley email response to M. Chandarana re Additional Subscription Document with attachment	RDLC-SEC 0961407 - 2 pp.	
1635	2/28/2013	Order re Motions in Peterson v. Islamic Rep. of Iran	75 pp.	
1636	2/28/2013	MSJ Opinion and Order in Peterson v. Islamic Rep. of Iran		
1637	2/28/2013	Pluris Valuation Data	RDLC-SEC 001671	Unreliable
1638	2/28/2013	Pluris Portfolio Valuation Report (February 2013)	RDLC-SEC 205386	Unreliable
1639	2/28/2013	RD Legal Monthly Data	RDLC-SEC 334573	
1640	2/28/2013	K. Markovic email to R. Dersovitz; cc A. Hirsch, L. Zatta, K. Mallon, M. Chandarana re DDQ - final update with attachment - RD Legal Due Diligence Questionnaire 02282013	SECLIT-EPROD-001223001 - 016	
1641	3/1/2013	R. Slifka email to R. Dersovitz; cc M. Gottlieb, K. Markovic re no subject	RDLC-SEC 0960662 - 685	
1642	3/1/2013	RD Legal Capital, LLC Compliance Manual	SECLIT-EPROD-000003238	Irrelevant
1643	3/4/2013	R. Slifka email to David Brail re RD Legal with attachments	SECLIT-EPROD-000690418 - 426	Irrelevant
1644	3/11/2013	Email chain between Leo Zatta, Roni Dersovitz and Espen Robak (Pluris)	PVA0004886	
1645	3/19/2013	Emails between RD and Mr. Cummings	SEC Investigative Exhibit 16	
1646	3/19/2013	S. Gurnins email to R. Dersovitz; cc S. Gurnins, P. Craig and earlier emails re no subject	RDLC-SEC 201570 - 571	
1647	3/19/2013	Email re call with Perles	RDLC-SEC 1006615 - 617	
1648	3/20/2013	Email between K. Markovic and Slifka.	SAM 006254-55	
1649	3/20/2013	R. Dersovitz email to R. Slifka re Peterson - Scheduling update, post-Opinion with attachments	SECLIT-EPROD-000690649 - 687	
1650	3/21/2013	Email from K. Markovic to Slifka.	SAM 006266-67	
1651	3/21/2013	Email between K. Markovic and Slifka.	SAM_006266	
1652	3/27/2013	R. Dersovitz email response to A. Sinensky re Hello . . .	RDLC-SEC 0981092	
1653	3/29/2013	A. Sinensky email to J. Herskovits	RDLC-SEC 0981087	
1654	3/29/2013	K. Markovic email to R. Dersovitz, Mike Crawford, A. Sinensky, Joel Herskovits, Courtney Byrd re RD Legal with attachments - RD Legal Overview, RD Legal Capital presentation, and RD Legal FAQ	SECLIT-EPROD-000023256 - 286	
1655	3/31/2013	Pluris Valuation Data	RDLC-SEC 001682	Unreliable
1656	3/31/2013	Pluris Portfolio Valuation Report (March 2013)	RDLC-SEC 205396	
1657	3/31/2013	RD Legal Monthly Data	RDLC-SEC 334571	
1658	3/31/2013	Independent Accountant's Report on Applying Agreed Upon Procedures 1Q2013	RDLC-SEC 336684	Irrelevant
1659	3/31/2013	03-31-2013 Wiss & Co. AUP Report	RDLC-SEC 940152	Irrelevant; Unreliable
1660	3/31/2013	1Q2013 RDLC Portfolio Statistics	RDLC-SEC 940528	
1661	3/31/2013	Independent Accountants' Report on Applying Agreed-upon Procedures for RD Legal Capital, LLC Quarter ended March 31, 2013	SECLIT-EPROD-000705358 - 368	Irrelevant; Unreliable
1662	3/31/2013	RD Legal Capital 1Q2013 Portfolio Statistics	SECLIT-EPROD-000705399	
1663	3/31/2013	RD Legal Capital, LLC 1Q2013 Portfolio Statements	SEC-SEC-E-0016461	
1664	4/1/2013	Printout of R. Dersovitz's calendar from April 2013	RDLC-SEC 096596	
1665	4/1/2013	Consulting agreement between R. Dersovitz and Randy Slifka	SAM6577	
1666	4/1/2013	Email exchange between R. Dersovitz and Randy Slifka	SAM_001279	
1667	4/5/2013	K. Markovic email to Sam Young re RD Legal Capital with attachments	RDLC-SEC 237053 - 122	
1668	4/15/2013	R. Dersovitz email to R. Slifka re most recent decision with attachments	RDLC-SEC 871104 - 192	
1669	4/15/2013	Email from R. Dersovitz and Slifka attaching consulting agreement	SAM 001406-10	
1670	4/15/2013	R. Dersovitz email to R. Slifka attaching Reed Smith Memos	RDLC-SEC 871104 - 193	
1672	4/16/2013	R. Slifka email to Daniel Loeb; cc R. Dersovitz re RD Legal with attachments	SECLIT-EPROD-000569098 - 1076	Irrelevant; Unreliable

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1673	4/16/2013	R. Dersovitz email to John (?) re: RD Legal and its "oversized" position in Peterson	SECLIT-EPROD-000690919, SECLIT-EPROD-000690920, SECLIT-EPROD-000690921, SECLIT-EPROD-000690923	Irrelevant; Unreliable
1674	4/16/2013	Email exchange between R. Dersovitz and Randy Slifka	SAM 001413	
1675	4/17/2013	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding Partners LP - 2012 Audited Financial Statements with attachments	SECLIT-EPROD-000940789	
1676	4/17/2013	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding Offshore Fund LTD - 2012 Audited Financial Statements with attachment	SECLIT-EPROD-000984739	
1677	4/20/2013	Reed Smith - Analysis of the Peterson v. Islamic Republic of Iran Order and Opinion	RDLC-SEC 638137 - 150	
1678	4/20/2013	Reed Smith - Analysis of the Peterson v. Islamic Republic of Iran Order and Opinion	RDLC-SEC 639682	
1679	4/23/2013	Emails between K. Markovic and W. Partridge	PAR 0068	
1680	4/23/2013	M. Chandarana email to all re RD Legal Capital - 1Q2013 Portfolio Statistics with attachment	RDLC-SEC 115709; RDLC-SEC 133774	Unreliable
1681	4/23/2013	Wiss engagement agreement with RDLF	SECLIT-EPROD-000844671	
1682	4/24/2013	R. Slifka email to D. Loeb	RDLC-SEC 897814	Irrelevant; Unreliable
1683	4/25/2013	S. Gumins email to R. Dersovitz and earlier emails re ___	RDLC-SEC 029275 - 276	
1684	4/25/2013	K. Markovic email to A. Sinensky, Ronald Slevin, George Gladman, Jeffrey Tucker re Arthur Sinensky investment in RD Legal Capital, LLC with attachments - RD Legal Funding Offshore Fund, Ltd. Confidential Explanatory Memo, RDLFP W-9, and RD Legal Funding Offshore Fund, Ltd. US Tax Exempt Sub Doc	RDLC-SEC 088178 - 252	
1685	4/25/2013	R. Slifka email to Edward Mule at Silver Point Capital; cc R. Dersovitz re RD Legal with attachments	SECLIT-EPROD-00069117 - 194	Irrelevant; Unreliable
1686	4/30/2013	Pluris Valuation Data	RDLC-SEC 001693	Unreliable
1687	4/30/2013	RD Legal Monthly Data	RDLC-SEC 337262	
1688	4/30/2013	R. Slifka email re Jonathan Kolatch; cc roD re RD Legal with attachments	SECLIT-EPROD-000691656 - 733	Irrelevant; Unreliable
1689	5/1/2013	J. Riley email to C. Riley, J. Riley re RD Legal update	SECLIT-EPROD-000716019	
1690	5/2/2013	Overview for RD Legal Capital, LLC and RD Legal Funding Partners, LP	RDLC-SEC 0968006	
1691	5/8/2013	Reed Smith - Update on Peterson Turnover Litigation and Implementation of the Iran Threat Reduction and Syria Human Rights Act of 2012	RDLC-SEC 654806 - 809	
1692	5/8/2013	Memorandum from James C. Martin et al to Roni Dersovitz, "Update on Peterson Turnover Litigation and Implementation of the Iran Threat Reduction and Syria Human Rights Act of 2012"	RDLC-SEC 656983 - 986	
1693	5/11/2013	R. Dersovitz email to R. Slifka re no subject with attachment	RDLC-SEC 870643 - 647	
1694	5/11/2013	R. Dersovitz email to R. Slifka attaching Reed Smith Memo	SECLIT-EPROD-000698594	
1695	5/11/2013	R. Dersovitz email to R. Slifka re no subject with attachment	SECLIT-EPROD-000691812 - 816	
1697	5/13/2013	T. Lowe email to R. Dersovitz and earlier emails re holdback__	RDLC-SEC 0953085-086	
1698	5/14/2013	M. Chandarana email to Dr. Richard Lieblich; cc K. Markovic re RD Legal Capital with attachments	RDLC-SEC 0959772 - 842	
1699	5/15/2013	J. Riley email response to M. Chandarana re Name as Reference - RD Legal Capital	RDLC-SEC 0961144 - 145	
1700	5/16/2013	S. Perles email to R. Dersovitz re: Peterson litigation	RDLC-SEC 587728	
1701	5/17/2013	Fully executed master participation agreement by and between RD legal funding partners and CCY	RDLC-SEC 077163	
1702	5/20/2013	K. Markovic email to N. Doubleday and earlier emails re Firstrust	SECLIT-EPROD-000014203 - 206	
1703	5/31/2013	Pluris Valuation Data	RDLC-SEC 001704	Unreliable
1704	5/31/2013	Contracts with CCY and Cedars	RDLC-SEC 097816 - RDLC-SEC 098117	
1705	5/31/2013	RD Legal Monthly Data	RDLC-SEC 324560	
1706	6/1/2013	Confidential Private Offering Memorandum and Addendum	RDLC-SEC 940306	
1707	6/1/2013	Confidential Explanatory Memorandum and Addendum	RDLC-SEC 940906	
1709	6/6/2013	Email chain between L. Zatta and Phil	RDLC-SEC 049218	
1710	6/9/2013	S. Perles email to R. Dersovitz re: 5th ave	RDLC-SEC 523159	
1711	6/13/2013	L. Budzynski email to P. Craig; cc M. Chandarana, RD Legal Admin re RD Legal Funding Partners, LP - Redemption Note with attachments	SECLIT-EPROD-000050554 - 555	
1712	6/13/2013	L. Budzynski email to RD Legal Investors; cc M. Chandarana re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000887998	
1713	6/13/2013	RD Legal Admin email to info re New Password - RD Legal Funding Partners	RDLC-SEC 1005503	
1714	6/19/2013	C. Tavel email to J. Genovesi re RDLF-2014 re: The Whittock Firm	SECLIT-EPROD-000550450 - 452	
1715	6/30/2013	Confidential Explanatory Memorandum RD Legal Funding Offshore Fund, Ltd.	RDLC-SEC 000346 - 394	
1716	6/30/2013	Pluris Valuation Data	RDLC-SEC 001722	Unreliable
1717	6/30/2013	Various Pluris Report (June, July, September 2013)	RDLC-SEC 001722, 001739, 001775	
1718	6/30/2013	Independent Accountant's Report on Applying Agreed Upon Procedures 2Q2013	RDLC-SEC 045658	Irrelevant; Unreliable

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1719	6/30/2013	Confidential Private Offering Memorandum of RD Legal Funding Partners, LP	RDLC-SEC 047236 - 271	
1720	6/30/2013	Confidential Private Offering Memorandum of RD Legal Funding Partners, LP	RDLC-SEC 087202 - 236	
1721	6/30/2013	RD Legal Monthly Data	RDLC-SEC 324504	
1722	6/30/2013	RDLC DDQ (June 2013)	RDLC-SEC 591561	
1723	6/30/2013	06-30-2013 Wiss & Co. AUP Report	RDLC-SEC 940258	Irrelevant; Unreliable
1724	6/30/2013	2Q2013 RDLC Portfolio Statistics	RDLC-SEC 940530	
1725	6/30/2013	Confidential Private Offering Memorandum Limited Partnership Interests of RD Legal Funding Partners	SECLIT-EPROD-000703339 - 373	
1726	6/30/2013	Confidential Explanatory Memorandum for RD Legal Funding Offshore Fund, Ltd.	SECLIT-EPROD-000703603 - 649	
1727	6/30/2013	RD Legal Capital 2Q2013 Portfolio Statistics	SECLIT-EPROD-000705381	
1728	7/1/2013	Amendment to the LPA	RDLC-SEC 940291	
1729	7/1/2013	Limited Partnership Agreement	RDLC-SEC 941020	
1730	7/1/2013	Limited Partnership Agreement of RD Legal Funding Partners, LP	SECLIT-EPROD-000705110 - 123	
1731	7/1/2013	Amendment to the Limited Partnership Agreement of RD Legal Funding Partners, LP	SECLIT-EPROD-000705206 - 208	
1732	7/9/2013	Fund Agreement in Peterson	19 pp.	
1733	7/9/2013	Final Turnover Order in Peterson	21 pp.	
1734	7/9/2013	Order re Qualified Settlement Fund in Peterson	3 pp.	
1735	7/9/2013	Agreement for the Peterson \$468B Fund Pursuant to 26 U.S.C. §468E	RDLC-SEC 937119	
1736	7/10/2013	R. Dersovitz email to S. Perles and earlier emails re Peterson v. Islamic Republic of Iran Order	RDLC-SEC 320668 - 171	
1737	7/15/2013	Plaintiff Rebate Agreement (July 2013 Young)	RDLC-SEC 096946-65	
1738	7/2/2013	Email chain between Leo Zatta, Katarina Markovic, Roni Dersovitz and Kananaka.	RDLC-SEC 092792	
1739	7/24/2013	D. Dent email to K. Markovic and earlier emails re RG update	RDLC-SEC 0955584 - 586	
1740	7/24/2013	M. Chandarana email to J. Riley; cc K. Markovic and earlier emails re RD Legal Capital, LLC - Performance Update	RDLC-SEC 0972446 - 448	
1741	7/25/2013	Plaintiff Non-Rebate Agreement (Burley July 2013)	RDLC-SEC 096984-94	
1742	7/25/2013	M. Chandarana email to B. Haisten and earlier emails re RD Legal Capital - Office Visit	RDLC-SEC 1006024	
1743	7/26/2013	Smith Mazure memorandum re: Beatie & Osborn, LLP	RDLC-SEC 292617	Unreliable
1744	7/26/2013	K. Masakazu email to R. Dersovitz	RDLC-SEC 469832	Unreliable
1745	7/29/2013	M. Chandarana email to S. Geraci; cc K. Markovic, M. Spadafora re RD Legal Capital with attachments	RDLC-SEC 032522 - 674	
1746	7/29/2013	K. Markovic email to M. Spadafora forwarding email chain with D. Dent re NDA	RDLC-SEC 0951183 - 186	
1747	7/29/2013	M. Chandarana email to P. Craig and earlier emails re RD Legal Capital Redemptions	SECLIT-EPROD-000050556 - 557	
1748	7/31/2013	Pluris Valuation Data	RDLC-SEC 001739	Unreliable
1749	7/31/2013	Email between Mr. Dersovitz and Pluris (potential claw-back for privilege)	RDLC-SEC 071197	
1750	7/31/2013	L. Zatta email to E. Robak; cc E. Liu, R. Dersovitz re BP Transactions with attachments	RDLC-SEC 074503	Unreliable
1751	7/31/2013	S. Gottlieb email to M. Spadafora	RDLC-SEC 174850	
1752	7/31/2013	M. Spadafora email to S. Gottlieb	RDLC-SEC 174851	
1753	7/31/2013	M. Spadafora email to S. Gottlieb	RDLC-SEC 175200 - 241	
1754	7/31/2013	RD Legal Monthly Data	RDLC-SEC 314476	
1755	7/31/2013	RDLC DDQ (July 2013)	RDLC-SEC 638220	
1756	7/31/2013	R. Dersovitz email to P. Craig and earlier emails re Thursday	SECLIT-EPROD-000050558 - 559	
1757	8/1/2013	C. Tavel email to J. Genovesi	RDLC-SEC 251664	
1758	8/2/2013	July 31, 2013 NBV and Collateral Listing RDL sent to Pluris, attached to exhibit 76.	SECLIT-EPROD-000000964; RDLC-SEC 059379	
1759	8/2/2013	M. Chandarana email to D. Dent; cc K. Markovic re RD Legal Capital with attachments	RDLC-SEC 0972208 - 237	
1760	8/2/2013	M. Chandarana email to S. Geraci; cc T. Hutchinson and earlier emails re RDLC with attachments	RDLC-SEC 0972238 - 269	
1761	8/2/2013	Email K. Markovic sends to Randy attaching 1 page overview	SAM 002748	
1762	8/9/2013	K. Markovic email to D. Dent re Peterson with attachment	RDLC-SEC 728795 - 826	
1763	8/12/2013	Email regarding Tiger 21 meeting in Miami.	SAM 009727-30	
1764	8/13/2013	Summary of Investment Opportunity	RDLC-SEC 084606	
1765	8/14/2013	J. Riley email to FAM Investment Committee; cc J. Riley re Call notes with Roni Dersovitz - RD Legal	SECLIT-EPROD-000716024	
1766	8/15/2013	J. Riley email response to M. Chandarana re Reference	RDLC-SEC 0960362 - 363	
1767	8/21/2013	J. Martin email to R. Dersovitz, R. Slifka and earlier emails re Peterson	RDLC-SEC 0944891 - 892	
1768	8/22/2013	T. Lowe email to M. Chandarana; cc K. Markovic, R. Dersovitz and earlier emails re call	RDLC-SEC 209815 - 817	Unreliable
1769	8/23/2013	Reed Smith memorandum: Impact of Colorado Court of Appeals Case on the RD Transactions in Other Select UCCC States	RDLC-SEC 716219	
1770	8/26/2013	Reed Smith - Peterson v. Islamic Republic of Iran Litigation - Appeal	RDLC-SEC 654780 - 800	
1771	8/27/2013	J. Martin email to R. Dersovitz, R. Slifka, D. Bird and earlier emails re Peterson	RDLC-SEC 0952916	
1772	8/29/2013	K. Markovic email to R. Dersovitz re: marketing materials	RDLC-SEC 234661 - 665	
1773	8/31/2013	Pluris Valuation Data	RDLC-SEC 001757	Unreliable

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1774	8/31/2013	RD Legal Capital Alpha Generation and Process	RDLC-SEC 176500 - 525	
1775	8/31/2013	RD Legal Monthly Data	RDLC-SEC 292544	
1776	8/31/2013	RD Legal Special Ops Fund Summary of Investment Opportunity	RDLC-SEC 940714	
1777	8/31/2013	Special Purpose Vehicle, Summary of Investment Opportunity (August 2013)	SECLIT-EPROD-000022522	
1778	9/1/2013	RD Legal Special Opportunities Partners I, LP - Offering Memorandum	RDLC-SEC 941313	
1779	9/11/2013	Emails between K. Markovic and W. Partridge	PAR 0052	
1780	9/11/2013	Email between K. Markovic and W. Partridge.	RDLC-SEC 084605	
1781	9/11/2013	K. Markovic email to A. Mantell re: SPV... "very large cases that we cannot take full advantage of in our flagship funds..."	RDLC-SEC 084617, RDLC-SEC 084618, RDLC-SEC 084620	
1782	9/11/2013	K. Markovic email to A. Mantell re follow up with attachments	RDLC-SEC 220542 - 543	
1783	9/11/2013	K. Markovic email to J. Riley re follow up with attachments	RDLC-SEC 234310	
1784	9/11/2013	K. Markovic email to T. Lowe re follow up with attachments	RDLC-SEC 234338 - 344	
1785	9/11/2013	K. Markovic email to R. Slifka re Updated Marines' summary and term sheet with attachments	SECLIT-EPROD-000692631 - 636	
1786	9/11/2013	Henry Ingram email forward to R. Slifka re follow up with attachments	SECLIT-EPROD-000692637 - 644	
1787	9/12/2013	K. Markovic email to N. Vaisman	RDLC-SEC 036575	
1788	9/12/2013	D. Bird email to R. Slifka; cc R. Dersovitz, R. Heppner, J. Martin and earlier emails re Peterson questions	RDLC-SEC 0944888 - 890	
1789	9/13/2013	Emails between Mr. Dersovitz and "Tiger 21" Investors	RDLC-SEC 026263	
1790	9/13/2013	R. Dersovitz email to A. Sinensky and earlier emails re RD Iran	RDLC-SEC 028528 - 530	
1792	9/16/2013	Email chain re funding Ruiz law firm	RDLC-SEC 159743	
1793	9/16/2013	L. Zatta email to E. Liu, R. Dersovitz; cc E. Robak re Meeting request with attachments	PVA0008326	
1794	9/17/2013	R. Dersovitz email to A. Sinensky attaching news article	RDLC-SEC 198685	
1795	9/17/2013	Wiss & Company, LLP letter to R. Dersovitz at RD Legal Capital, LLC re Independent Accountants' Report on Applying Agreed-upon Procedures	SECLIT-EPROD-000705370 - 380	Irrelevant; Unreliable
1796	9/18/2013	L. Budzynski email to All with extensive bcc list re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000912721 - 734	
1797	9/18/2013	M. Spadafora email to all; bcc is long list re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000912732 - 734; SECLIT-EPROD-000912721 - 731	
1798	9/19/2013	K. Markovic email to J. Riley and earlier emails re follow up	RDLC-SEC 234061 - 063	
1799	9/20/2013	Email chain between Leo Zatta, Roni Dersovitz, Eric Lui (Pluris) and Espen Robak.	RDLC-SEC 060928	
1800	9/20/2013	R. Slifka email response to R. Dersovitz, A. Mantell re no subject	RDLC-SEC 0952879 - 880	
1801	9/20/2013	J. Burrow email to M. Spadafora re RD Legal - Special Opportunities	RDLC-SEC 291859 - 860	
1802	9/21/2013	R. Dersovitz email to A. Mantell and R. Slifka	RDLC-SEC 015249	
1803	9/23/2013	R. Dersovitz email to A. Mantell; cc R. Slifka re Joel Simon with attachment	RDLC-SEC 0980774 - 775	
1804	9/23/2013	A. Mantell email to R. Slifka re: appointment to speak with J. Simon	SECLIT-EPROD-00069121	
1805	9/23/2013	R. Dersovitz email to A. Mantell and R. Slifka	SECLIT-EPROD-000692674, SECLIT-EPROD-000692675	
1806	9/25/2013	A. Mantell email to Joel M. Simon; cc Randy Slifka re RDLF-00103 In Re: Beatie & Osborn, LLP	SECLIT-EPROD-000702692 - 693	
1807	9/26/2013	Email from L. Zatta to P. Wisard and Wisard response and earlier emails re WG: October Proposed Participations	RDLC-SEC 089657 - 666	
1808	9/26/2013	RD Legal Special Opportunities Partners I, LP - Limited Partnership Agreement	RDLC-SEC 943083	
1809	9/27/2013	A. Mantell email to R. Slifka; cc R. Dersovitz, Andrea Ring re no subject	RDLC-SEC 027362 - 368	
1810	9/27/2013	R. Dersovitz email to A. Mantell (cc Slifka)	RDLC-SEC 0952854	
1811	9/27/2013	R. Dersovitz email to A. Mantell (cc Slifka)	RDLC-SEC 0958638	
1812	9/27/2013	Email from Barbara to Patric Wisard describing RDLC	RDLC-SEC 168707	
1813	9/27/2013	K. Markovic email to J. Burrow re follow up with attachments	RDLC-SEC 722123 - 252	
1814	5/31/2014	May 31, 2014 Pluris Report	PVA 0012463 (RDLC-SEC 049791)	
1815	9/30/2013	RDLSOOF Offering Memorandum (September 2013)	RDLC-SEC 000868	
1816	9/30/2013	Pluris Valuation Data	RDLC-SEC 001775	Unreliable
1817	9/30/2013	Independent Accountant's Report on Applying Agreed Upon Procedures 3Q2013	RDLC-SEC 045669	Irrelevant
1818	9/30/2013	RDLSOOF Offering Memorandum (September 2013)	RDLC-SEC 075942	
1819	9/30/2013	Pluris Portfolio Valuation Report (September 2013)	RDLC-SEC 205455	Unreliable
1820	9/30/2013	RD Legal Monthly Data	RDLC-SEC 314027	
1821	9/30/2013	Confidential Explanatory Memorandum for RD Legal Special Opportunities Partners	RDLC-SEC 838519	
1822	9/30/2013	09-30-13 Wiss & Co. AUP Report	RDLC-SEC 940422	Irrelevant; Unreliable
1823	9/30/2013	3Q2013 RDLC Portfolio Statistics	RDLC-SEC 940532	
1824	9/30/2013	SPV Marketing Deck from K. Markovic (September 2013)	SECLIT-EPROD-00000510	
1825	9/30/2013	RD Legal Capital 3Q2013 Portfolio Statistics	SECLIT-EPROD-000705357	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
1826	9/30/2013	Independent Accountants' Report on Applying Agreed-upon Procedures for RD Legal Capital, LLC Quarter ended September 30, 2013	SECLIT-EPROD-000705382 - 392	Irrelevant; Unreliable
1827	10/1/2013	A. Mantell email to R. Dersovitz and R. Slifka	RDLC-SEC 0952803	
1828	10/1/2013	R. Dersovitz email to R. Slifka re: Peterson news article	SECLIT-EPROD-000692739	
1829	10/2/2013	M. Chandarana email to A. Mantell with attachment	RDLC-SEC 0952783 - 791	
1830	10/3/2013	S. Gottlieb email to K. Markovic, M. Chandarana and others re marketing materials	RDLC-SEC 178647	Unreliable
1831	10/3/2013	S. Gottlieb email to K. Markovic, M. Chandarana, M. Spadafora; cc A. Hirsch, R. Dersovitz, K. Burdette, L. Zatta re Marketing Material	SEC-SEC-E-0000004	Unreliable
1832	10/5/2013	R. Dersovitz email forward to R. Slifka re Confidential - Peterson - Update re: U.S.-Iranian Relations	SECLIT-EPROD-000692764 - 766	
1833	10/8/2013	M. Spadafora email to S. Gottlieb	RDLC-SEC 175110 - 111	
1834	10/8/2013	S. Gottlieb email to M. Spadafora re Alpha qer	RDLC-SEC 914705	
1835	10/11/2013	Tom Condon email to R. Dersovitz re Peterson vs. Iran SPV	RDLC-SEC 026511	
1836	10/12/2013	R. Dersovitz email to S. Perles with attachment	RDLC-SEC 869425	
1837	8/2/12	Email chain between Leo Zatta, Roni Dersovitz, Eric Lui (Pluris) and Espen Robak (Pluris)	RDLC-SEC 063913	
1838	10/17/2013	K. Markovic email to R. Dersovitz, D. Backens; cc M. Chandarana and earlier emails re Certis Update with attachments	RDLC-SEC 233298 - 304	
1839	10/17/2013	K. Markovic email to R. Dersovitz, D. Backens; cc M. Chandarana and earlier emails re Certis Update with attachments	RDLC-SEC 233298 - 304	
1840	10/17/2013	Form ADV Part 1A	RDLC-SEC 942396	
1841	10/23/2013	M. Spadafora email to S. Gottlieb and A. Hirsch with updated marketing materials (reflecting Sept. performance)	RDLC-SEC 178630	Unreliable
1842	10/23/2013	M. Spadafora email to S. Gottlieb and A. Hirsch with updated marketing materials (reflecting Sept. performance)	RDLC-SEC 178632	Unreliable
1843	10/23/2013	M. Spadafora email to S. Gottlieb and A. Hirsch with updated marketing materials (reflecting Sept. performance)	RDLC-SEC 178852 - 880	
1844	10/24/2013	Reed Smith memorandum: Analysis of Use of English Language Contracts with Foreign Language Speakers	RDLC-SEC 716238	
1845	10/30/2013	Email chain between Leo Zatta, Philip Larochelle, Eric Lui (Pluris) and Espen Robak.	RDLC-SEC 049575; PVA 0033695	
1847	10/31/2013	Pluris Valuation Data	RDLC-SEC 001794	Unreliable
1848	10/31/2013	Pluris Portfolio Valuation Report (October 2013)	RDLC-SEC 205465	Unreliable
1849	10/31/2013	RD Legal Monthly Data	RDLC-SEC 324228	
1850	11/5/2013	CCY Participation Schedule A-100 (Cohen December 2013)	RDLC-SEC 125195 - 196	
1851	11/6/2013	M. Chandarana email to T. Hutchinson and earlier emails re RD Legal - New client with attachments	RDLC-SEC 0988511 - 539	
1852	11/6/2013	L. Vogel (Salon Marrow) letter to Hon. C. Wolfe re In Re Bank Markazi	RDLC-SEC 233003 - 004	
1853	11/6/2013	K. Markovic email response to M. Chandarana re HHM	RDLC-SEC 1005536	
1854	10/15/13	E. Liu email to L. Zatta, cc R. Dersovitz, E. Robak re Meeting	PVA0032770	
		R. Dersovitz email to K. Markovic, J. Genovesi, L. Zatta, B. Larala, Jehanara Haider,		
1855	11/8/2013	M. Chandarana re NY Times: 3 European Officials Join Kerry at Iran Talks	RDLC-SEC 206836	
1856	11/8/2013	R. Dersovitz email to K. Markovic re NYT article	RDLC-SEC 251061	
1857	11/12/2013	Email between K. Markovic and Jason Riley	RDLC-SEC 034123	
1858	11/12/2013	J. Riley email to K. Markovic re Peterson	RDLC-SEC 232992	
1859	11/12/2013	K. Markovic email response to J. Riley, R. Dersovitz; cc C. Riley re Thanks and follow up	RDLC-SEC 295786 - 787	
1860	11/13/2013	J. Riley email to J. Riley re Meeting notes - RD Legal NYC 11/16/13	SECLIT-EPROD-000716476	
1861	11/14/2013	M. Spadafora email to S. Gottlieb, A. Hirsch, and others, requesting review of updated marketing materials	RDLC-SEC 177303 - 305	
1862	11/14/2013	M. Spadafora email to S. Gottlieb, A. Hirsch, and others, requesting review of updated marketing materials	RDLC-SEC 177323	
1863	11/14/2013	M. Spadafora email to S. Gottlieb, A. Hirsch, and others, requesting review of updated marketing materials	RDLC-SEC 177325 - 326	
1864	11/15/2013	M. Chandarana email to R. Slifka, Margaret Ford; cc K. Markovic re RD Legal Capital with attachment	RDLC-SEC 0954527 - 529	
1865	11/25/2013	M. Spadafora email to S. Gottlieb and A. Hirsch re: presentior	RDLC-SEC 174849	
1866	11/25/2013	M. Spadafora email to S. Gottlieb and A. Hirsch re: presentation	RDLC-SEC 175057 - 076	
1867	11/26/2013	S. Gottlieb email to M. Spadafora	RDLC-SEC 172817 - 819	
1868	11/30/2013	Pluris Valuation Data	RDLC-SEC 001816	Unreliable
1869	11/30/2013	RD Legal Monthly Data	RDLC-SEC 324181	
1870	12/9/2013	M. Spadafora email to S. Gottlieb and A. Hirsch with updates to DDC	RDLC-SEC 190023	
1871	12/9/2013	M. Spadafora email to S. Gottlieb and A. Hirsch with updates to DDC	RDLC-SEC 190025	
1872	12/17/2013	J. Burrow email to M. Chandarana re Name as reference	RDLC-SEC 1007062	
1873	12/19/2013	J. Riley email response to M. Chandarana re Name as Reference - RD Legal Capital	RDLC-SEC 0959271 - 272	
1874	12/31/2013	Net Revenue and Expenses From Operation of Legacy Funds 2013	1 pg.	Unreliable
1875	12/31/2013	RD Legal Capital, LLC ("RDLC") Marketing Presentation on "Alpha Generation and Processes."	PAR 0001	
1876	12/31/2013	Pluris Valuation Data	RDLC-SEC 001837	Unreliable
1877	12/31/2013	RD Legal Funding Offshore Fund, Ltd. Financial Statements	RDLC-SEC 004438 - 473	Irrelevant
1878	12/31/2013	RD Legal Funding Partners, LP 2013 year-end financials	RDLC-SEC 004474	Irrelevant
1879	12/31/2013	RD Legal Funding Offshore Fund, LTD. 2013 year-end financials.	RDLC-SEC 004438 - 473	Irrelevant

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1880	12/31/2013	RD Legal Full Portfolio Data	RDLC-SEC 1004768	Unreliable
1881	12/31/2013	RD Legal Monthly Data	RDLC-SEC 324037	
1882	12/31/2013	4Q2013 RDLC Portfolio Statistics	RDLC-SEC 940535	
1883	12/31/2013	Memorandum from Marcum re RD Legal Funding Partners, LP - Value of Loan Portfolio as of December 31, 2013	SECLIT-EPROD-000032928	
1884	12/31/2013	RD Legal Funding Offshore Fund, Ltd. Financial Statements	SECLIT-EPROD-0007048865 - 900	Irrelevant
1885	12/31/2013	RD Legal Funding Partners, LP Financial Statements	SECLIT-EPROD-000704901 - 927	Irrelevant
1886	12/31/2013	RD Legal Capital 4Q2013 Portfolio Statistics	SECLIT-EPROD-000705369	
1887	12/31/2013	Dersovitz 1040 Tax Return for 2013	RDLC-SEC 1007053 - 054	Unreliable
1888	1/2/2014	G. Cook email to M. Chandarana and earlier emails re Wohush Partnership with attachment	RDLC-SEC 1005311 - 333	
1889	1/10/2014	CCY Participation Schedule A-106 (Osborn January 2014)	RDLC-SEC 130936-937	
1890	1/10/2014	CCY Participation Schedule A-109 (Cohen January 2014)	RDLC-SEC 130942 - 043	
1891	1/16/2014	M. Spadafora email to R. Slička; cc M. Chandarana re RD Legal - SPV Documents with attachments	RDLC-SEC 208653 - 782	
1892	1/17/2014	R. Lowe email to All re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000946371	
1893	1/22/2014	Reed Smith - Analysis of January 22, 2014 Clearstream - Treasury Department Settlement	RDLC-SEC 111141	
1894	1/24/2014	Investor Services at Woodfield email to P. Craig re Monthly Investor Report for Paul C. Craig from RD Legal Funding Partners, LP with attachment	SECLIT-EPROD-000050575 - 576	
1895	1/28/2014	M. Chandarana email to S. Geraci and earlier emails re RD Legal Capital, LLC - Performance Update	RDLC-SEC 0988694 - 696	
1896	1/28/2014	M. Chandarana email to all; bcc is long list re 4Q2013 RDLC Portfolio Statistics with attachment	RDLC-SEC 0984064 - 066	
1897	1/31/2014	Puris Valuation Data	RDLC-SEC 001858	Unreliable
1898	1/31/2014	Puris Portfolio Valuation Report (January 2014)	RDLC-SEC 201589	Unreliable
1899	1/31/2014	RD Legal Monthly Data	RDLC-SEC 323898	
1900	1/31/2014	RDLC DDQ (January 2014)	RDLC-SEC 642098	
1901	1/31/2014	RD Legal Capital Alpha Generation and Process	RDLC-SEC 680415	
1902	2/1/2014	RD Legal Capital: Frequently asked Questions	RDLC-SEC 267172 - 177	
1903	2/4/2014	R. Dersovitz email to K. Markovic attaching Clearstream and UBAE settlements	RDLC-SEC 643486	
1904	2/4/2014	M. Spadafora email to A. Hirsch, S. Gottlieb and others re: DDQ edits	RDLC-SEC 930205 219	
1905	2/6/2014	J. Genovesi email to C. Tavel re Dockets & Documentation with attachments - Reyer - Docket, Siemens Appellate Brief, Springer - Docket, Welch - Docket	RDLC-SEC 934875 and 88 pp.	
1906	2/12/2014	Reed Smith memorandum: Analysis of January 22, 2014 Clearstream - Treasury Department Settlement	RDLC-SEC 111141	
1907	2/12/2014	Reed Smith - Analysis of the Appellees' Brief in Peterson v. Islamic Republic of Iran	RDLC-SEC 716213 - 217	
1908	2/18/2014	M. Spadafora email response to R. Lieblich; cc K. Markovic re RD Legal Capital with attachments	RDLC-SEC 034989 - 5063	
1909	2/18/2014	T. Lowe email to M. Spadafora re Referral Request	RDLC-SEC 0952563 - 564	
1910	2/20/2014	Investor Services at Woodfield email to P. Craig re Monthly Investor Report for Paul C. Craig from RD Legal Funding Partners, LP with attachment	SECLIT-EPROD-000050582 - 583	
1911	2/21/2014	A. Mantell email to K. Markovic	RDLC-SEC 190780 - 873	
1912	2/25/2014	T. Lowe email to M. Chandarana re Name as Reference	RDLC-SEC 0954410 - 411	
1913	2/25/2014	RD Legal Funding Partners, LP Partial Redemption Confirmation for P. Craig	SECLIT-EPROD-000049830	
1914	2/28/2014	Puris Valuation Data	RDLC-SEC 001880	Unreliable
1915	2/28/2014	RD Legal Monthly Data	RDLC-SEC 323828	
1916	3/3/2014	Memorandum from James C. Martin to R. Dersovitz Dersovitz, "Analysis of the Appellees' Brief in Peterson v. Islamic Republic of Iran"	RDLC-SEC 640922 - 927	
1917	3/3/2014	M. Chandarana email to J. Burrow re Name as reference	RDLC-SEC 1007396 - 397	
1918	3/7/2014	M. Chandarana email to R. Lieblich; cc M. Spadafora re RD Legal Capital with attachment	RDLC-SEC 0948792 - 794	
1919	3/8/2014	R. Lieblich email to M. Chandarana; cc M. Spadafora and earlier emails re Documents from Richard Lieblich with attachments	RDLC-SEC 634730 - 773	
1920	3/10/2014	M. Spadafora email to R. Lieblich and earlier emails re Documents from Richard Lieblich with attachment	RDLC-SEC 0958943 - 947	
1921	3/10/2014	Fay Schedule A-9 (March 2014)	SECLIT-EPROD000719383-91	
1922	3/11/2014	M. Spadafora email to R. Lieblich and earlier emails re Wire Transfer	RDLC-SEC 0958936 - 939	
1923	3/12/2014	L. Zatta email to Precilla Alcantara; cc K. Jesson and earlier emails re Richard Lieblich sub docs with attachments	RDLC-SEC 1006661 - 681	
1924	3/14/2014	Robert Kramer email to R. Slička and earlier emails re Ip agreement	SECLIT-EPROD-000700006 - 009	Irrelevant
1925	3/17/2014	Demonstrative -- Tiger Details	(none provided)	
1926	3/18/2014	T. Condon email to R. Dersovitz re Checking in	RDLC-SEC 026510	
1927	3/18/2014	M. Chandarana email to J. Riley; cc M. Spadafora and earlier emails re Partial redemption request	RDLC-SEC 0951685 - 687	
1928	3/18/2014	J. Riley email response to M. Chandarana re Name as Reference - RD Legal Capital	RDLC-SEC 0954176 - 177	

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1929	3/18/2014	M. Chandarana email to J. Burrow re Name as reference	RDLC-SEC 1007395	
1930	3/20/2014	Email from R. Dersovitz to Slifka.	SAM 003727	
1931	3/24/2014	RD Legal Capital, LLC Form ADV Part 2A Disclosure Brochure	RDLC-SEC 184249 - 265	
1932	3/24/2014	Form ADV Part 2A	RDLC-SEC 943671	
1933	3/24/2014	From: Allen Demby to Tiger 21 investors re Iran Deal	SAM 006455 - 456	
1934	3/25/2014	Email chain between Tiger 21 members including Allem Demby writes to Alan Mantell, George Mrkonjic, Waring Partidge, Slifka, Steven Wils, Art Sinensky.	SAM 006489 - 491	
1935	3/25/2014	Email chain between Slifka and R. Dersovitz	SAM 003740	Irrelevant; Unreliable
1936	3/27/2014	Sal Geraci email to K. Markovic and earlier emails re WSJ Article	RDLC-SEC 035690 - 692	
1937	3/27/2014	M. Chandarana email to K. Jesson re New Account with attachment and earlier emails with B. Beckers	RDLC-SEC 929918 - 925	
1938	3/28/2014	R. Lowe email to All re RD Legal Funding Partners, LP - 2013 Audited Financial Statements with attachment	SECLIT-EPROD-000860680	
1939	3/28/2014	R. Lowe email to All re RD Legal Funding Offshore Fund, Ltd. - 2013 Audited Financial Statements with attachment	SECLIT-EPROD-000915401	
1940	3/31/2014	RD Legal Capital, LLC Alpha Generation and Process	18 pp.; SEC069	
1941	3/31/2014	RD Legal Capital, LLC Frequently asked Questions	6 pp.; SEC068	
1942	3/31/2014	Pluris Valuation Data	RDLC-SEC 001901	Unreliable
1943	3/31/2014	Independent Accountant's Report on Applying Agreed Upon Procedures 1Q2014	RDLC-SEC 040158	Irrelevant; Unreliable
1944	3/31/2014	RD Legal Monthly Data	RDLC-SEC 323599	
1945	3/31/2014	03-31-2014 Wiss & Co. AUP Report	RDLC-SEC 940163	Irrelevant
1946	3/31/2014	1Q2014 RDLC Portfolio Statistics	RDLC-SEC 940529	
1947	4/1/2014	N. Anderson email responding to Peter Levy, Bernard Levy & Co. email re RD Legal Group	SECLIT-EPROD-000703567 - 569	Irrelevant
1948	4/2/2014	S. Perles email to R. Dersovitz re: scheduling update in Peterson litigation	RDLC-SEC 199572	
1949	4/3/2014	R. Lieblich email to M. Spadafora re Amended page 5 of Agreement with attachment	RDLC-SEC 0947983 - 984	
1950	4/3/2014	N. Anderson handwritten notes re meeting with RD Legal	SECLIT-EPROD-000704658	Unreliable
1951	4/6/2014	Reed Smith memorandum	RDLC-SEC 615197	
1952	4/7/2014	Confidentiality Agreement between RD Legal Funding Partners, RD Legal Funding, LLC, RD Legal Capital, and Bernard Levy & Co	5 pp	Irrelevant
1953	4/7/2014	N. Anderson email responding to P. Levy re RD Legal Group	SECLIT-EPROD-000704162 - 164	Irrelevant
1954	4/10/2014	M. Chandarana email to M. Spadafora	RDLC-SEC 189946	Unreliable
1955	4/10/2014	M. Spadafora email to M. Chandarana	RDLC-SEC 300577	Unreliable
1956	4/16/2014	Investor Services at Woodfield email to P. Craig re Monthly Investor Report for Paul C. Craig from RD Legal Funding Partners, LP with attachment	SECLIT-EPROD-000050614 - 615	
1957	4/22/2014	M. Spadafora email to P. Levy; cc K. Markovic re RD Legal Marketing Documents and DDO	1 p.; SEC067	
1958	4/23/2014	M. Spadafora email to all re RD Legal Capital - 1Q2014 Portfolio Statistics with attachment	RDLC-SEC 124190; RDLC-SEC 117891	
1959	4/24/2014	T. Lowe email to M. Spadafora and earlier emails re RD Legal Capital LLC - Performance Update	RDLC-SEC 0947911 - 917	
1960	4/25/2014	A. Ishimaru email to P. Craig and earlier emails re redemption	SECLIT-EPROD-000050616 - 619	Irrelevant
1961	4/29/2014	Email chain between P. Laroche and Eric Liu	RDLC-SEC 058817	
1962	4/29/2014	R. Lowe email to R. Lieblich; cc RD Legal Admin, M. Chandarana M. Spadafora re RD Legal Funding Partners, LP - Investor Welcome Letter with attachments	RDLC-SEC 0953297 - 299	
1963	4/30/2014	RD Legal Capital, LLC Due Diligence Questionnaire	11 pp.	
1964	4/30/2014	Pluris Valuation Data	RDLC-SEC 001923	Unreliable
1965	4/30/2014	Pluris - Portfolio Valuation Report for RD Legal Capital LLC	RDLC-SEC 001924	Unreliable
1966	4/30/2014	RD Legal Monthly Data	RDLC-SEC 322542	
1967	4/30/2014	Fay Transaction Summary (April 2011 to April 2014)	SECLIT-EPROD-000719142	Unreliable
1968	4/30/2014	Fay Schedule A-10 (April 2014)	SECLIT-EPROD-000719375-81	
1969	4/30/2014	RD Legal Capital, LLC Due Diligence Questionnaire	SECLIT-EPROD-000703947 - 957	
1970	5/1/2014	RD Legal Special Opportunities Offshore Fund I, Ltd - Offering Memorandum	RDLC-SEC 941265	
1971	5/7/2014	CCY Participation Schedule A-132 (Cohen May 2014)	RDLC-SEC 133414 - 415	
1972	5/9/2014	N. Anderson email responding to P. Levy email re PPM's and Subscription Documents	SECLIT-EPROD-000704165 - 166	Irrelevant
1973	5/9/2014	P. Levy email to N. Anderson forwarding M. Spadafora email to P. Levy re Audited Financials	SECLIT-EPROD-000704780 - 781	Irrelevant
1974	5/9/2014	P. Levy email to N. Anderson forwarding M. Spadafora email to P. Levy, cc K. Markovic re PPM's and Subscription Documents	SECLIT-EPROD-000705108	Irrelevant
1975	5/9/2014	P. Levy email to N. Anderson forwarding M. Spadafora email re Investor Communications	SECLIT-EPROD-000705355 - 356	Irrelevant
1976	5/12/2014	05.12.2014 RDLFOF Resolution	RDLC-SEC 940199	Irrelevant
1977	5/19/2014	Reed Smith memorandum	RDLC-SEC 611189	
1978	5/20/2014	N. Anderson email to P. Levy re RD legal due-diligence	SECLIT-EPROD-0007033335 - 337	Irrelevant
1979	5/20/2014	N. Anderson email to P. Levy re RD legal due-diligence	SECLIT-EPROD-000704761 - 762	Irrelevant
1980	5/27/2014	P. Levy email to M. Spadafora re RD Legal Questions	RDLLC-SEC 272493	Irrelevant
1981	5/27/2014	P. Levy email to N. Anderson re RD Legal DDO	SECLIT-EPROD-000704403	Irrelevant

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

<u>Trial Exh. No.</u>	<u>Doc. Date</u>	<u>Document Description</u>	<u>Bates</u>	<u>Specific Objections*</u>
1982	5/28/2014	M. Spadafora email to H. MacLellan; cc R. Dersovitz, K. Markovic re additional subscription form attached	RDLC-SEC 0952533 - 534	
1983	5/28/2014	C. Tavel email to J. Genovesi re BP	SECLIT-EPROD-000522736	
1984	5/28/2014	Mark Berman, MB Family Advisors, LLC email to P. Levy; cc N. Anderson re NDA	SECLIT-EPROD-000703490	Irrelevant
1985	5/28/2014	M. Berman email to N. Anderson re RD Legal	SECLIT-EPROD-000703497	Irrelevant
1986	5/29/2014	J. Riley email to M. Spadafora; cc K. Markovic and earlier emails re Partial redemption request modification with attachment	RDLC-SEC 0951696 - 697	
1987	5/31/2014	Pluris Valuation Data	RDLC-SEC 001944	Unreliable
1988	5/31/2014	RD Legal Monthly Data	RDLC-SEC 307622	
1989	5/31/2014	RDLC DDQ (May 2014)	RDLC-SEC 631000	
1990	6/5/2014	Plaintiff Non-Rebate Agreement (Callahan June 2014)	RDLC-SEC 097070-92	
1991	6/6/2014	M. Spadafora email to R. Lieblich re RD Legal Additional Subscription Form with attachment	RDLC-SEC 0957864 - 865	
1992	6/6/2014	08.06.2014 RDLFOF Resolution	RDLC-SEC 940232	
1993	6/6/2014	08.06.2014 RDL SOP, Ltd. Resolution	RDLC-SEC 940232	
1994	6/6/2014	08.06.2014 Corporate Resolution RDLC & RDL SOP, Ltd	RDLC-SEC 942088	
1995	6/10/2014	N. Anderson email to P. Levy re RD Legal	SECLIT-EPROD-000703650 - 652	
1996	6/10/2014	P. Levy email to N. Anderson re RD Legal	SECLIT-EPROD-000704069	
1997	6/11/2014	R. Lieblich email to M. Spadafora and earlier emails re Wire Transfer	RDLC-SEC 0952643 - 644	
1998	6/13/2014	M. Spadafora email to J. Riley and earlier emails re RD Reference Request	RDLC-SEC 0957850 - 851	
1999	6/13/2014	K. Markovic response to M. Spadafora email re Update call	RDLC-SEC 270424 - 425	
2000	6/13/2014	Master Participation Agreement Between RD Legal and Constant Cash Yield	RDLC-SEC 668130 -	
2001	6/13/2014	J. Burrow email to M. Spadafora re RD Legal Group	RDLC-SEC 1007059	
2002	6/16/2014	W. Partridge email to R. Dersovitz	RDLC-SEC 246094	
2003	6/17/2014	RD Legal Admin email to P. Craig; cc RD Legal Admin, M. Spadafora re RD Legal Funding Partners, LP - Redemption Confirmation with attachmen	SECLIT-EPROD-000050620 - 625	
2004	6/19/2014	C. Tavel email to J. Genovesi	RDLC-SEC 482067 - 482068	Unreliable
2005	6/24/2014	M. Spadafora email to J. Riley and earlier emails re Update call with attachments	RDLC-SEC 0957764 - 765	
2006	6/25/2014	R. Dersovitz email to A. Sinensky and earlier emails re Follow up to telephone call	RDLC-SEC 027508 - 509	
2007	6/26/2014	Justin Young email to K. Markovic, M. Spadafora; cc Michael Schneider, Nick Cicero re Audit Review with attachment	SECLIT-EPROD-000009826	
2008	6/30/2014	Pluris Valuation Data	RDLC-SEC 001965	Unreliable
2009	6/30/2014	RD Legal Monthly Data	RDLC-SEC 306303	
2010	6/30/2014	RDLC DDQ (June 2014)	RDLC-SEC 592105	
2011	6/30/2014	06-30-2014 Wiss & Co. AUP Report	RDLC-SEC 940278	Irrelevant
2012	6/30/2014	2Q2014 RDLC Portfolio Statistics	RDLC-SEC 940531	
2013	6/30/2014	Confidential RD Legal Capital, LLC Due Diligence Questionnaire	SECLIT-EPROD-001033997 - 4007	
2014	7/1/2014	Email chain between Slifka and R. Dersovitz	SAM 004172	Unreliable
2015	7/1/2014	Alpha Generation & Process Presentation	SEC108	
2016	7/1/2014	July 2014 FAQ	SEC123	
2017	7/7/2014	Ryan Lowe, RD Legal email to RD Legal; bcc list of investors with attachment - Independent Accountant's Report on Applying Agreed-Upon Procedures for RD Legal Funding, LLC prepared by Wiss & Co. fo rquarter ending 3/31/2014	15 pp.; SECLIT-EPROD-000915682	
2018	7/7/2014	R. Lowe email to All re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000915682	
2019	7/8/2014	R. Lowe email to R. Lieblich; cc RD Legal Admin, M. Spadafora re RD Legal Funding Partners, LP - Additional Subscription Confirmation with attachmen	RDLC-SEC 0953324 - 325	
2020	7/9/2014	Peterson v. Islamic Rep. of Iran , 758 F.3d 185 (2d Cir. 2014)	7 pp.	
2021	7/9/2014	De-Registration Notice - RDLFOF	RDLC-SEC 940612	
2022	7/9/2014	De-Registration Notice - RDLFP	RDLC-SEC 940613	
2023	7/9/2014	De-Registration Notice - RDL SOOF	RDLC-SEC 940614	
2024	7/9/2014	De-Registration Notice - RDL SOP	RDLC-SEC 940615	
2025	7/14/2014	Email chain between Slifka and Alan Mantell	SAM 005520-21	
2026	7/16/2014	M. Spadafora email to D. Backens re RD Legal - AUP Reports with attachments	RDLC-SEC 0957253 - 461	
2027	7/24/2014	Email exchange between R. Dersovitz and Randy Slifka	SEC070	
2028	7/31/2014	Pluris Valuation Data	RDLC-SEC 001986	Unreliable
2029	7/31/2014	RD Legal Monthly Data	RDLC-SEC 304991	
2030	7/31/2014	RDLC DDQ (July 2014)	RDLC-SEC 645061	
2031	7/31/2014	RDLC FAQ (July 2014)	SECLIT-EPROD-000007878	
2032	7/31/2014	Alpha Generation and Process Presentation (July 2014)	SECLIT-EPROD-000022476	
2033	8/1/2014	RD Legal FAQ	RDLC-SEC 940896	
2034	8/1/2014	RD Legal FAQ	RDLC-SEC 940901	
2035	8/14/2014	B. Thompson email to S. Gottlieb re: edits to DDQ and FAQ for his review	RDLC-SEC 178658 - 660	
2036	8/14/2014	B. Thompson email to S. Gottlieb re: edits to DDQ and FAQ for his review	RDLC-SEC 178666 - 678	
2037	8/14/2014	S. Gottlieb email to B. Thompson re DDQ and FAQ	RDLC-SEC 915929	
2038	8/22/2014	Email chain between E. Liu, L. Zatta, P. Laroche, K. Burdette, and E. Robak re Zadroga Special Deal - Flat Out Purchases	PVA0016607	

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2039	8/29/2014	T. Dawes email to K. Markovic; cc D. Backens and earlier emails re Questions	RDLC-SEC 081502 - 503	
2040	8/31/2014	Pluris Valuation Data	RDLC-SEC 002007	Unreliable
2041	8/31/2014	RD Legal Monthly Data	RDLC-SEC 302774	
2042	9/5/2014	M. Spadafora email to S. Gottlieb requesting review of alpha gen and FAC	RDLC-SEC 176704	
2043	9/15/2014	K. Markovic email to Patrick Farnsley; cc M. Spadafora re current presentation, FAQ, etc. with attachments	RDLC-SEC 1005175 - 267	
2044	9/19/2014	Breanna Thompson email to G. Cook; cc M. Spadafora re RD Sub Dox re: Jenks Parker with attachments	RDLC-SEC 1005103 - 173	Unreliable
2045	9/30/2014	Pluris Valuation Data	RDLC-SEC 002027	Unreliable
2046	9/30/2014	Independent Accountant's Report on Applying Agreed Upon Procedures 3Q2014	RDLC-SEC 046179	Irrelevant
2047	9/30/2014	Pluris Portfolio Valuation Report (September 2014)	RDLC-SEC 193511	Unreliable
2048	9/30/2014	RD Legal Monthly Data	RDLC-SEC 301390	
2049	9/30/2014	09-30-2014 Wiss & Co. AUP Report	RDLC-SEC 940433	Irrelevant; Unreliable
2050	9/30/2014	3Q2014 RDLC Portfolio Statistics	RDLC-SEC 940533	
2051	11/24/2014	E. Liu email to L. Zatta; cc E. Robak, R. Dersovitz and earlier emails re old cases	RDLC-SEC 065601	
2052	10/21/2014	K. Markovic email to R. Lieblich and earlier emails re Monthly stats	RDLC-SEC 0965836 - 837	
2053	10/23/2014	M. Spadafora email to R. Lieblich re RD Legal Additional Investment	RDLC-SEC 0956872	
2054	10/23/2014	M. Spadafora email to R. Lieblich re RD Wire Instructions with attachment RDLC-SEC 0956873 -	RDLC-SEC 0956873 - 874	
2055	10/24/2014	R. Lowe email to All with extensive bcc list re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000850126 - 129	
2056	10/30/2014	Email from L. Zatta to Eric Liu.	RDLC-SEC 049105	
2057	10/31/2014	Pluris Valuation Data	RDLC-SEC 002047	Unreliable
2058	10/31/2014	RD Legal Monthly Data	RDLC-SEC 299750	
2059	11/3/2014	J. Riley email to M. Spadafora; cc K. Markovic and earlier emails re New investment with attachments	RDLC-SEC 624902 - 907	
2060	11/3/2014	A. Hirsch email to L. Zatta; cc R. Dersovitz, P. Larochelle, A. Hirsch re Marine Plaintiff and Attorney files Feb 2014 to June 2014 with attachment - RDLOF Marine Plif 2014 02 to 2014 06	SECLIT-EPROD-000350956 - 969	
2061	11/5/2014	L. Zatta letter to D. Osborn re Marcum LLP audit	MARCUM00019837 - 838	
2062	11/11/2014	D. Schall and Samuel Young of Marcum (Cayman) letter to L. Zatta re Engagement of Marcum (Cayman)	MARCUM00009554 - 564	
2063	11/11/2014	Dennis Schall, Marcum Accountants & Advisors letter to L. Zatta re Engagement of Marcum LLP	MARCUM00009576 - 586	
2064	11/21/2014	D. Osborn letter to Joel Simon, Smith, Mazure, Director, Wilkens, Young & Yagerman re Osborn Law	SECLIT-EPROD-000498959 - 962	
2065	11/24/2014	S. Perles email to R. Dersovitz	RDLC-SEC 586933 - 587004	Irrelevant; Unreliable
2066	11/25/2014	E. Liu email to R. Dersovitz; cc E. Robak, C. Sherry, L. Zatta and earlier emails re old cases	SECLIT-EPROD-000067796 - 799	
2067	11/26/2014	Email from Leo Zatta to Roni Dersovitz, Eric Lui (Pluris) and Espen Robak	RDLC-SEC 073057	
2068	11/30/2014	Pluris Valuation Data	RDLC-SEC 002067	Unreliable
2069	11/30/2014	RD Legal Monthly Data	RDLC-SEC 640457	
2070	12/3/2014	R. Dersovitz email to C. Fay (cc T. Fay, S. Perles, and others)	RDLC-SEC 516085	
2071	12/5/2014	Plaintiff Rebate Agreement (Prevait December 2014)	RDLC-SEC 097183-209	
2072	12/17/2014	Osborn-Smith Mazure correspondence	SECLIT-EPROD000833495 - 588	Unreliable
2073	12/18/2014	Fay Schedule A-11 (Peterson December 2014)	SECLIT-EPROD000719113-20	
2074	12/23/2014	Civil Cover Sheet and Complaint in USDC, New Jersey, Case No. 14-7983 (FSH), RD Legal Funding Partners, LP v. Powell, et al	139 pp.	
2075	12/23/2014	Declaration of Daniel A. Osborn, Esq. in USDC, New Jersey, Case No. 14-7983 (FSH), RD Legal Funding Partners, LP v. Powell, et al	5 pp.	Unreliable
2077	12/31/2014	Net Revenue and Expenses From Operation of Legacy Funds 2014	1 pg.	Unreliable
2078	12/31/2014	RD Legal Funding Partners, LP Financial Statements	RDLC-SEC 008555 - 582	Irrelevant
2079	12/31/2014	Pluris Valuation Data	RDLC-SEC 002086	Unreliable
2080	12/31/2014	RDLC 2014 Consolidated Financial Statements	RDLC-SEC 014998	Irrelevant
2081	12/31/2014	RD Legal Capital Valuation Policy (2014)	RDLC-SEC 056925	
2082	12/31/2014	RD Legal Full Portfolio Data	RDLC-SEC 1004769	Unreliable
2083	12/31/2014	RD Legal Capital Alpha Generation and Process	RDLC-SEC 174935 - 958	
2084	12/31/2014	RD Legal Monthly Data	RDLC-SEC 297827	
2085	12/31/2014	RD LFP Subscription Documents (December 2014)	RDLC-SEC 593372	
2086	12/31/2014	RD Legal Funding Offshore Fund, Ltd. Financial Statements for 2014	RDLC-SEC 597826	Irrelevant
2087	12/31/2014	4Q2014 RDLC Portfolio Statistics	RDLC-SEC 940536	
2088	12/31/2014	RD Legal Funding Partners, LP Financial Statements	SECLIT-EPROD-000110809 - 836	Irrelevant
2089	12/31/2014	RD Legal Funding, LLC Financial Statements	SECLIT-EPROD-000704341 - 367	Irrelevant
2090	12/31/2014	Dersovitz 1040 Tax Return for 2014	RDLC-SEC 1007055	Unreliable
2091	1/3/2015	Email with Art Simensky	RDLC-SEC 027428	
2092	1/8/2015	R. Lowe email to All re RD Legal Funding - Quarterly AUP Report with attachment	SECLIT-EPROD-000850376	
2093	1/13/2015	Plaintiff Receivables Sold at Fair Value	RDLC-SEC 046195	Unreliable
2094	1/20/2015	K. Markovic email to B. Beckers; cc M. Spadafora re Touching Base with attachments	RDLC-SEC 085899 - 6056	
2095	1/21/2015	Assignment and Sale Agreement Between Francis T. McBride and RD Legal	SECLIT-EPROD-000938764	Irrelevant

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2096	1/31/2015	Pluris Valuation Data	RDLC-SEC 002107	Unreliable
2097	1/31/2015	RD Legal Monthly Data	RDLC-SEC 296059	
2098	2/4/2015	Australia License Confirm	RDLC-SEC 940085	Irrelevant
2099	2/9/2015	Memorandum from Marcum re RD Legal Funding Partners, LP - Value of Loan Portfolio as of December 31, 2014	SECLIT-EPROD-000032948 - 951	Unreliable
2100	2/10/2015	Rael Gorelick email response to N. Anderson re Introduction	SECLIT-EPROD-000704189 - 191	Irrelevant; Unreliable
2101	2/12/2015	Miriam Freier email to R. Gorelick; cc N. Anderson re Introduction	SECLIT-EPROD-000703539	Irrelevant; Unreliable
2102	2/15/2015	N. Anderson email to M. Freier re Connecting re: RD Legal	SECLIT-EPROD-000704763 - 765	Irrelevant; Unreliable
2103	2/24/2015	K. Markovic email to T. Dawes re Peterson Judgment and Turnover Orders with attachments	RDLC-SEC 706371 - 427	
2104	2/26/2015	T. Hutchinson email to K. Markovic and earlier emails re HHM Wealth clients invested in RD Legal	RDLC-SEC 192949 - 951	
2105	2/26/2015	T. Hutchinson email to K. Markovic (cc S. Geraci) re: Peterson news items	RDLC-SEC 192949	
2106	2/26/2015	Fay Schedule A-13 (February 2015)	SECLIT-EPROD000719323-30	
2107	2/27/2015	M. Spadafora email to T. Dawes; cc K. Markovic and earlier emails re Questions with attachment	RDLC-SEC 0956334 - 337	
2108	2/28/2015	Pluris Valuation Data	RDLC-SEC 002128	Unreliable
2109	2/28/2015	RD Legal Monthly Data	RDLC-SEC 294700	
2111	2/28/2015	RD Legal Overview	RDLC-SEC 940717	
2112	2/28/2015	RD Legal Overview	RDLC-SEC 940716	
2113	2/28/2015	RD Legal Overview	RDLC-SEC 940718	
2114	2/28/2015	RD Legal Overview	RDLC-SEC 940719	
2115	2/28/2015	RD Legal Overview	RDLC-SEC 940721	
2117	3/1/2015	RD Legal Due Diligence Questionnaire	RDLC-SEC 940806	
2118	3/1/2015	RD Legal Due Diligence Questionnaire	RDLC-SEC 940821	
2119	3/1/2015	RD Legal Due Diligence Questionnaire	RDLC-SEC 940836	
2120	3/1/2015	RD Legal Due Diligence Questionnaire	RDLC-SEC 940851	
2121	3/1/2015	RD Legal Due Diligence Questionnaire	RDLC-SEC 940881	
2122	3/1/2015	RD Legal Presentation	RDLC-SEC 941075	
2123	3/1/2015	RD Legal Presentation	RDLC-SEC 941099	
2124	3/1/2015	RD Legal Presentation	RDLC-SEC 941123	
2125	3/1/2015	RD Legal Presentation	RDLC-SEC 941147	
2126	3/1/2015	RD Legal Presentation	RDLC-SEC 941195	
2127	3/31/2015	Pluris Valuation Data	RDLC-SEC 002150	Unreliable
2128	3/31/2015	RD Legal document entitled "Indicated Portfolio Value"	SEC Investigative Exhibit 40	
2129	3/31/2015	RD Legal Monthly Data	RDLC-SEC 292590	
2130	3/31/2015	RD Legal Capital, LLC Statement of Changes in Net Asset Value for D. Devire	SECLIT-EPROD-000689409	Unreliable
2131	4/8/2015	K. Markovic email response to T. Dawes re Updated Docs with attachments	RDLC-SEC 705570 - 644	
2132	4/16/2015	K. Markovic email to T. Hutchinson and earlier emails re RD Legal Presentation outline with attachment	RDLC-SEC 034438 - 462	
2133	4/17/2015	K. Markovic email to R. Lieblich re redemption form with attachment	RDLC-SEC 034052 - 053	
2134	4/22/2015	J. Burrow email to K. Markovic; cc M. Spadafora and earlier emails re RD Legal Capital, LLC - Performance Update	RDLC-SEC 0947234 - 240	
2135	4/23/2015	C. Sherry invitation for conference call with R. Dersovitz, K. Markovic, R. Lieblich	RDLC-SEC 0977890	
2136	4/25/2015	M. Spadafora email to S. Dabbah; cc R. Dersovitz, K. Markovic re RDLFP Documents with attachments	RDLC-SEC 616951 - 7004	
2137	4/30/2015	Pluris Valuation Data	RDLC-SEC 002169	Unreliable
2138	4/30/2015	Pluris Portfolio Valuation Report (April 2015)	RDLC-SEC 190039	Unreliable
2139	4/30/2015	RD Legal Monthly Data	RDLC-SEC 291145	
2140	5/1/2015	R. Lieblich email response to M. Spadafora re Redemption form R and D Lega	RDLC-SEC 0947213	
2141	5/1/2015	R. Lieblich email to M. Spadafora, K. Markovic re Redemption form R and D Legal with attachment	RDLC-SEC 0950462 - 463	
2142	5/1/2015	K. Markovic email to T. Hutchinson re RD collections data with attachment	RDLC-SEC 0965213 - 214	
2143	5/4/2015	K. Markovic email to T. Dawes, D. Backens re Historical Collections with attachment	RDLC-SEC 0965195 - 196	
2145	5/5/2015	K. Markovic email to T. Dawes and earlier emails re Good News	RDLC-SEC 0965181 - 182	
2146	5/6/2015	J. Burrow email to K. Markovic; cc D. Seeds, J. Gordo and earlier emails re Correspondence Regarding Your Investment in RD Legal Funding Offshore Fund Ltd.	RDLC-SEC 0950365 - 370	
2147	5/7/2015	M. Freier email to N. Anderson re RD Legal Funding Partners, LP - 2014 Audited Financial Statements	SECLIT-EPROD-000704338 - 340	Irrelevant
2148	5/7/2015	R. Lowe email to All re RD Legal Funding Partners, LP - 2014 Audited Financial Statements with attachment	SECLIT-EPROD-000893184	
2149	5/7/2015	R. Lowe email to All re RD Legal Funding Offshore Fund, Ltd. - 2014 Audited Financial Statements with attachment	SECLIT-EPROD-000916316	
2150	5/11/2015	K. Markovic email to J. Riley, R. Dersovitz; cc M. Spadafora and earlier emails re Request	RDLC-SEC 0948820 - 822	
2151	5/12/2015	J. Burrow email to K. Markovic; cc J. Gordo, M. Spadafora and earlier emails re Follow Up Questions	RDLC-SEC 0947172 - 176	
2155	5/14/2015	R. Dersovitz email response to Andrew Furgatch re today's update cal	RDLC-SEC 263356	Unreliable
2156	5/14/2015	Email exchange between R. Dersovitz and Andrew Furgatch	2 pp.	
2157	5/15/2015	M. Freier email to N. Anderson forwarding K. Markovic email re Magna Carta follow-up	1 p.	Irrelevant; Unreliable
2158	5/17/2015	Email chain between R. Sifka, A. Mantell and G. Mrkonic	SAM 000360-62	

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2159	5/19/2015	M. Frier email to K. Markovic asking about the largest line item in the audit-the 70% position in QSF	RDLC-SEC 238334	
2160	5/19/2015	R. Slifka email to G. Mrkonic; cc S. Wils, A. Mantell, D. Devitre, A. Demby, W. Partridge, M. Crawford, A. Sinensky and earlier emails re Plan for Thursdays RD legal conference call	SECLIT-EPROD-000689785 - 789	
2162	5/20/2015	K. Markovic email to T. Dawes; cc D. Backens, M. Spadafora and earlier emails re Historical Collections with attachments	RDLC-SEC 086784 - 816	
2163	5/21/2015	M. Freier email to K. Markovic	RDLC-SEC 186575	
2164	5/26/2015	K. Markovic email response to T. Hutchinson; cc S. Geraci re HHM Wealth	RDLC-SEC 034387 - 388	
2165	5/26/2015	R. Dersovitz email to S. Perles	RDLC-SEC 772161	
2166	5/27/2015	C. Sherry invitation for conference call with R. Dersovitz, R. Lieblich, M. Spadafora	RDLC-SEC 0944853	
2167	5/27/2015	K. Markovic email to H. Macdellan re Please call me with attachment	RDLC-SEC 0964734 - 736	
2168	5/29/2015	K. Markovic email to S. Geraci, T. Hutchinson, P. Farnsley re domestic letter with attachments	RDLC-SEC 086729 - 730	
2169	5/29/2015	K. Markovic email to S. Geraci; cc T. Hutchinson, P. Farnsley re preview of the letter to offshore investors with attachments	RDLC-SEC 0964694 - 696	
2170	5/29/2015	K. Markovic email to T. Dawes, D. Backens re Letters to Investors with attachments	RDLC-SEC 045855 - 858	
2171	5/31/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2172	5/31/2015	RD Legal Monthly Data	RDLC-SEC 288157	
2173	6/1/2015	Email between A. Mantell and R. Slifka	SAM 000458 - 463	
2174	6/1/2015	RD Legal Funding Partners, LP Full Redemption Holdback Payment Confirmation to P. Craig	SECLIT-EPROD-000049707	
2175	6/2/2015	K. Markovic email response to J. Riley with attachments	RDLC-SEC 0964591 - 592	
2176	6/4/2015	T. Hutchinson email to C. Sherry and earlier emails re WSJ article from 6/1	RDLC-SEC 0977975 - 979	
2177	6/5/2015	K. Markovic email to B. Beckers; cc Caryn Sherry re Touching Base	RDLC-SEC 031808 - 814	
2178	6/5/2015	T. Hutchinson email to K. Markovic; cc P. Farnsley, S. Geraci re Jenks Parker	RDLC-SEC 036438	
2179	6/11/2015	M. Spadafora email to J. Burrow; cc K. Markovic re Updated Statements for Clients	RDLC-SEC 0949784 - 785	Unreliable
2180	6/15/2015	D. Backens email to K. Markovic	RDLC-SEC 189967	
2181	6/16/2015	K. Markovic email to P. Farnsley; cc T. Hutchinson, S. Geraci and earlier emails re RD Legal Questions with attachments	RDLC-SEC 031581 - 593	Unreliable
2182	6/16/2015	T. Hutchinson email to K. Markovic and earlier emails re RD Legal Questions	RDLC-SEC 035594 - 597	Unreliable
2183	6/16/2015	T. Hutchinson email to K. Markovic (cc S. Geraci) re: due diligence on Peterson (and other topics)	RDLC-SEC 189991 - 994	Unreliable
2184	6/16/2015	Corey Tavel email to Scott Huynh re RDLF-00100 RD Quarterly Audits: RD Legal Procedures	SECLIT-EPROD-000847761 - 762	
2185	6/18/2015	M. Spadafora email to D. Backens and earlier emails re Historical Collections	RDLC-SEC 308983 - 986	
2186	6/25/2015	S. Dabbah email to M. Spadafora, K. Markovic re Bina Dabbah RD F P LP Info with attachments	RDLC-SEC 601640 - 676	
2187	6/25/2015	K. Markovic email to T. Dawes; cc D. Backens, Kelly Smith and earlier emails re Follow up from Roni/Leo call	SECLIT-EPROD-000713788 - 790	
2188	6/25/2015	M. Spadafora email response to S. Dabbah, R. Dersovitz, K. Markovic, RD Legal Admin re Bina Dabbah RD F P LP Inf		
2189	6/30/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2190	6/30/2015	RD Legal Monthly Data	RDLC-SEC 283255	
2191	7/8/2015	J. Burrow email to C. Sherry; cc K. Markovic, RD Legal Admin, M. Spadafora, J. Gordo and earlier emails re RD Legal Client - Larry Enos	RDLC-SEC 0949334 - 343	
2192	7/14/2015	W. Partridge email to R. Dersovitz re: Iran	RDLC-SEC 186825	
2193	7/14/2015	R. Dersovitz email response to E. Robak; cc L. Zatta, E. Liu, C. Sherry reDiscussions with Perles and others re Iran deal	SECLIT-EPROD000052631 - 632	
2194	7/15/2015	R. Dersovitz email to T. Hutchinson; cc K. Markovic re no subject	RDLC-SEC 188153	Unreliable
2195	7/15/2015	T. Hutchinson email to R. Dersovitz (cc S. Geraci) re: security of Peterson funds	RDLC-SEC 188159	
2196	7/15/2015	K. Markovic email response to J. Riley re Question on Iran agreement	RDLC-SEC 224923 - 924	
2197	7/15/2015	R. Dersovitz email to W. Partridge re: current events related to Peterson	RDLC-SEC 224925	
2198	7/16/2015	R. Dersovitz email response to T. Hutchinson (cc S. Geraci) re: security of Peterson funds	RDLC-SEC 188153	Unreliable
2199	7/18/2015	G. Kaminsky email to R. Dersovitz asking whether there's mention of the Peterson monies in the Iran nuclear accord	RDLC-SEC 265755	
2200	7/20/2015	J. Burrow email to K. Markovic, R. Dersovitz; cc RD Legal Admin, L. Enos, J. Gordo re Larry Enos - Conference Call Today	RDLC-SEC 0948030	
2201	7/20/2015	R. Dersovitz email to J. Riley; cc K. Markovic and earlier emails re no subject	RDLC-SEC 188123 - 125	Unreliable
2202	7/20/2015	K. Markovic email to T. Dawes re marketing deck with attachment	RDLC-SEC 704313 - 337	Unreliable
2203	7/31/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2204	7/31/2015	RD Legal Monthly Data	RDLC-SEC 281175	
2205	8/12/2015	M. Spadafora email to J. Burrow; cc K. Markovic and earlier emails re Correspondence From RD Legal Funding Offshore Fund, Ltd. With attachments	RDLC-SEC 0992426 - 430	
2206	8/19/2015	R. Lieblich email response to K. Markovic re SG	RDLC-SEC 0948834	
2207	8/19/2015	K. Markovic email to All re SG with attachment	RDLC-SEC 224563 - 594	Unreliable

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Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2208	8/19/2015	K. Markovic email to T. Hutchinson; cc S. Geraci, P. Farnsley re SG with attachment	RDLC-SEC 224627 - 658	
2209	8/19/2015	K. Markovic email to All re SG with attachment	RDLC-SEC 224691 - 722	Unreliable
2210	8/24/2015	K. Markovic email to T. Dawes re fy with attachment	RDLC-SEC 224498 - 503	
2211	8/26/2015	K. Markovic email to J. Riley and earlier emails re article	RDLC-SEC 1000796 - 800	
2212	8/31/2015	RDLFP LPA (August 2015)	RDLC-SEC 183830	
2213	8/31/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2214	8/31/2015	RD Legal Monthly Data	RDLC-SEC 279119	
2215	8/31/2015	RDLFP Offering Memorandum (August 2015)	RDLC-SEC 700176	
2216	9/8/2015	J. Burrow email to M. Spadafora; cc K. Markovic, J. Gordo and earlier emails re Update on Cash Flow	RDLC-SEC 186555 - 558	
2217	9/8/2015	M. Spadafora email to J. Burrow; cc K. Markovic, J. Gordo re Update on Cash Flow with attachment	RDLC-SEC 1007471 - 504	
2218	9/9/2015	J. Riley email to FAM Investment Committee; cc J. Riley re Call notes RD Legal 9/3/15	SECLIT-EPROD-000716281 - 282	
2219	9/15/2015	M. Spadafora email to R. Lieblich; cc K. Markovic re RD Legal with attachment	RDLC-SEC 306029 - 060	
2220	9/22/2015	K. Markovic email to D. Backens; cc T. Dawes re Purchase Dates with attachment	RDLC-SEC 0962951 - 960	
2221	9/23/2015	B. Donohoo email to M. Spadafora; cc T. Hutchinson re Instructions	RDLC-SEC 0982834	
2222	9/24/2015	L. Zatta email to Michael Purce, Maury Cartine; cc D. Schall re RD Legal Special Opportunity Fund, LP with attachment	4 pp.	
2223	9/24/2015	M. Spadafora email response to B. Donohoo; cc T. Hutchinson, K. Markovic re Instructions	RDLC-SEC 0946954 - 955	
2224	9/28/2015	M. Spadafora email response to Ernie York; cc T. Hutchinson re My RD Legal Fund	RDLC-SEC 0990549	
2225	9/30/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2226	9/30/2015	RD Legal Monthly Data	RDLC-SEC 271553	
2227	10/5/2015	J. Burrow email to K. Markovic re Larry Enos	RDLC-SEC 186221 - 222	
2228	10/6/2015	T. Hutchinson email to M. Spadafora and earlier emails re WSJ article	RDLC-SEC 270077 - 079	
2229	10/9/2015	Pluris Subpoena	N/A	Irrelevant
2230	10/9/2015	E-mail. From: Espen Robak To: Leo. Zatta, Cc: Roni Dersovitz	PVA0003281	
2231	10/11/2015	K. Markovic email response to T. Dawes re Follow up	RDLC-SEC 221813	Unreliable
2232	10/12/2015	S. Newton email to K. Markovic	RDLC-SEC 190127	
2233	10/18/2015	G. Kaminsky email to R. Dersovitz re: offshore valuations of Peterson positions	RDLC-SEC 186083	
2234	10/28/2015	M. Spadafora email to J. Burrow, K. Markovic re Larry Enos - Update Please	RDLC-SEC 185809 - 810	
2235	10/31/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2236	10/31/2015	RD Legal Monthly Data	RDLC-SEC 274303	
2237	10/31/2015	Bank Statement for RD Legal Finance (October 2015);	3 pp.	
2238	11/1/2015	Documents concerning cash-flows at RDLC	RDLC-SEC 094606	Unreliable
2239	11/5/2015	J. Riley email to FAM Investment Committee; cc J. Riley re Call notes with RD Legal 11/5/15	SECLIT-EPROD-000716279	
2240	11/17/2015	M. Spadafora email to J. Burrow and earlier emails re Setting up a Call with Roni	RDLC-SEC 1007505 - 509	
2241	11/25/2015	R. Dersovitz email to Espen Robak; cc L. Zatta, Eric Liu re Perles call?	RDLC-SEC 330050 - 051	
2242	11/25/2015	RDLFOF Administration Services Agreement (November 2015)	RDLC-SEC 940020	Irrelevant
2243	11/25/2015	RDLFP Administration Services Agreement (November 2015)	RDLC-SEC 940027	Irrelevant
2244	11/30/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2245	11/30/2015	RD Legal Monthly Data	RDLC-SEC 271845	
2246	12/2/2015	T. Lee (KPMG) letter to RD Legal Finance att: R. Dersovitz re Valuation Estimates for the Plaintiff Receivables and respective Notes	RDLC-SEC 184446 - 452	Unreliable
2247	12/2/2015	N. Anderson email to M. Freier re Follow Up	SECLIT-EPROD-000704245 - 247	Irrelevant; Unreliable
2248	12/8/2015	T. Dawes email response to K. Markovic re distributions	RDLC-SEC 0945857 - 858	
2249	12/17/2015	R. Dersovitz letter to investors re return of liquidity to domestic func	RDLC-SEC 221502	Unreliable
2250	12/17/2015	K. Markovic email to all re RD Legal update with attachment	RDLC-SEC 300127 - 128	Unreliable
2251	12/17/2015	K. Markovic email to All re RD Legal update with attachment	RDLC-SEC 221501 - 502	Unreliable
2252	12/17/2015	K. Markovic email to All re RD Legal update with attachment	SECLIT-EPROD-000322662 - 663	Unreliable
2253	12/31/2015	Net Revenue and Expenses From Operation of Legacy Funds 2015	1 pg.	Unreliable
2254	12/31/2015	RD Legal Capital, DDQ (2015)	RDLC-SEC 032239	
2255	12/31/2015	Draw Summary - Jan through Dec 2015	RDLC-SEC 094658	Unreliable
2256	12/31/2015	Pluris Valuation Data with Contract Type	RDLC-SEC 1004749	Unreliable
2257	12/31/2015	RD Legal Full Portfolio Data	RDLC-SEC 1004770	Unreliable
2258	12/31/2015	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2259	12/31/2015	RDLFP 2015 Financial Statements (Draft)	RDLC-SEC 269236	Irrelevant
2260	12/31/2015	RD Legal Monthly Data	RDLC-SEC 269775	
2261	12/31/2015	RDL Special Investments DDQ (2015)	RDLC-SEC 591779	
2262	12/31/2015	RDLFP 2015 Financial Statements (Audited)	RDLC-SEC 940034	Irrelevant
2263	12/31/2015	Memorandum from Marcum re RD Legal Funding Partners, LP - Value of Loan Portfolio as of December 31, 2015	SECLIT-EPROD-000029304	Unreliable
2264	12/31/2015	Dersovitz 1040 Tax Return for 2015	RDLC-SEC 1007057	Unreliable
2265	1/4/2016	M. Spadafora email to T. Dawes; cc K. Markovic and earlier emails re Deck with attachment	RDLC-SEC 0945411 - 428	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2266	1/6/2016	M. Spadafora email to B. Beckers, K. Markovic; cc Gray Betsy re SBIC Income Fund with attachments	RDLC-SEC 303814 - 967	
2267	1/8/2016	L. Zatta letter to D. Osborn re Marcum LLP audit	MARCUM00020695 - 696	
2268	1/13/2016	KPMG LLP letter from Thomas Lee to R. Dersovitz re Valuation Estimates for Plaintiff and Attorney Fee Receivables as at December 31, 2015	RDLC-SEC 271510 - 516	Unreliable
2271	1/27/2016	R. Dersovitz email to T. Lowe re Transcript with attachments	RDLC-SEC 317138 - 216	
2272	1/28/2016	Fund Distribution Summary - Revised 1/28/16	2 pp.	Unreliable
2273	1/28/2016	Email with attached memos re Ruiz transaction	RDLC-SEC 155253	Irrelevant
2274	1/28/2016	Email chain between R. Dersovitz and K. Markovic re Actos claim	RDLC-SEC 158398	Irrelevant
2275	1/28/2016	Fund Distribution Summary	1 p.	Unreliable
2277	1/29/2016	J. Riley email to J. Riley; cc FAM Investment Committee re RD Legal call notes 1/29/16	SECLIT-EPROD-000716284 - 285	
2278	1/31/2016	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2279	1/31/2016	RD Legal Monthly Data	RDLC-SEC 269272	
2280	1/31/2016	RDLC Valuation Policy (January 2016)	SECLIT-EPROD-000035707	Irrelevant
2281	2/1/2016	Randy Slifka Subpoena	N/A	Irrelevant
2282	2/8/2016	K. Markovic subpoena	N/A	Irrelevant
2283	2/8/2016	R. Humes, SEC letter to E. Alcaraz re Appeal, Freedom of Information Act Request Nos. 16-04451-FOIA	6 pp.	Irrelevant
2284	2/10/2016	Espen Robak Subpoena	10 pp.	Irrelevant
2285	2/26/2016	T. Hutchinson email to R. Dersovitz (cc S. Geraci)	RDLC-SEC 357551	
2286	2/26/2016	T. Hutchinson email to R. Dersovitz, M. Spadafora; cc P. Famsley, C. Shery, R. Dersovitz re Scalia	RDLC-SEC 375265 - 268	
2287	2/26/2016	T. Hutchinson email to R. Dersovitz, M. Spadafora; cc P. Famsley, C. Shery, R. Dersovitz re Scalia	RDLC-SEC 375265 - 268	
2289	2/27/2016	Email from R. Dersovitz to Ephram Diamond.	RDLC-SEC 126801	Irrelevant
2290	2/28/2016	R. Lieblich email to R. Dersovitz and earlier emails re Supreme Court - Bank Markazi - Terrorism	RDLC-SEC 578574	
2291	2/29/2016	Pluris Valuation Data	RDLC-SEC 267593	Unreliable
2292	2/29/2016	RD Legal Monthly Data	RDLC-SEC 267609	
2293	3/1/2016	Espen Robak's biography	5 pp.	Irrelevant
2294	3/1/2016	L. Zatta's subpoena	n/a	Irrelevant
2295	3/1/2016	J. Burrow email to M. Spadafora; cc K. Markovic and earlier emails re Latest Update	RDLC-SEC 182720 - 722	
2298	3/21/2016	Email chain with Patric Wisard (CCY).	RDLC-SEC 154267	Irrelevant
2300	3/31/2016	RD Legal Monthly Data	RDLC-SEC 1004750	
2301	3/31/2016	Pluris Valuation Data	RDLC-SEC 1004751	Unreliable
2302	4/6/2016	Eric Liu Subpoena	SEC Investigative Exhibit 126	Irrelevant
2303	4/20/2016	Bank Markazi v. Peterson, 136 S.Ct. 1310 (2016)	24 pp.	
2305	4/25/2016	Larochelle Subpoena	2 pp.	Irrelevant
2306	4/30/2016	RD Legal Monthly Data	RDLC-SEC 1004752	
2307	4/30/2016	Pluris Valuation Data	RDLC-SEC 1004753	Unreliable
2308	4/30/2016	RD Legal Iran Payment Analysis	RDLC-SEC 1004764	Unreliable
2311	5/31/2016	RD Legal Monthly Data	RDLC-SEC 1004754	
2312	5/31/2016	Pluris Valuation Data	RDLC-SEC 1004755	Unreliable
2313	6/6/2016	Order Authorizing Distribution of Funds in in Petersor	4 pp.	
2314	6/10/2016	The Perles Law Firm, PC Profit & Loss January 1, 2010 through June 10, 2016	000003 - 005	
2315	6/10/2016	The Perles Law Firm, PC Profit & Loss January 1, 2010 through June 10, 2016 by year	000006 - 014	
2316	6/10/2016	The Perles Law Firm, PC Profit & Loss	SECLIT-EPROD-000028484	
2317	6/10/2016	The Perles Law Firm, PC Profit & Loss	SECLIT-EPROD-000028485	
2318	6/30/2016	RD Legal Monthly Data	RDLC-SEC 1004756	
2319	6/30/2016	Pluris Valuation Data	RDLC-SEC 1004757	Unreliable
2320	7/1/2016	Amy Hirsch's Resume	RDLC-SEC 1006708	Unreliable
2321	7/14/2016	Order Instituting Proceedings	16 pp.	
2322	7/20/2016	Declaration of N. Doubleday in US SEC Investigative File No. NY-09278, In the Matter of RD Legal Capital, LLC	SEC-SEC-E-0028745	Unreliable
2323	7/31/2016	RD Legal Monthly Data	RDLC-SEC 1004758	
2324	7/31/2016	Pluris Valuation Data	RDLC-SEC 1004759	Unreliable
2325	8/3/2016	P. Alcantara email to R. Dersovitz, K. Jesson; cc D. Schall, Z. Bird re RD Legal; Marine Barracks Investments - Updating Procedures Request	1 p.	
2326	8/5/2016	Response of RD Legal Capital to OIP	51 pp.	
2327	8/31/2016	RD Legal Monthly Data	RDLC-SEC 1004760	
2328	8/31/2016	Pluris Valuation Data	RDLC-SEC 1004761	Unreliable
2329	9/1/2016	Locke Lord Letter to Court in Peterson	2 pp.	Irrelevant
2330	9/2/2016	Fay Law Group Letter to Court - Forrest in Petersor	1 pp.	Irrelevant
2331	9/2/2016	Fay Law Group Letter to Sporkin in Petersor	2 pp.	Irrelevant
2332	9/12/2016	Eric Kanefsky, Calcagni & Kanefsky, LLP letter to P. Alcantara, Marcum LLP re Auditor Response Letter for RD Legal Funding Partners, LF	6 pp.	
2333	9/20/2016	R. Dersovitz letter to The Perles Law Firm, P.C. re Payoff Letter	5 pp.	
2334	9/21/2016	K. Jesson email to Z. Bird, L. Zheng; cc D. Schall, P. Alcantara re RD Legal Capital, LLC Open Items with attachments - RD Legal Offshore Unit Trust Financial Statements	21 pp.	
2335	9/30/2016	RD Legal Monthly Data	RDLC-SEC 1004762	
2336	9/30/2016	Pluris Valuation Data	RDLC-SEC 1004763	Unreliable
2337	9/30/2016	RD Legal Full Portfolio Data	RDLC-SEC 1004772	Unreliable
2339	11/3/2016	Tina Catalina email to D. Schall, P. Alcantara, Z. Bird re RE Legal Iranian Asset Analysis with attachment	3 pp.	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2340	11/14/2016	Fay Law Group Letter to Court - Forrest in Peterson	3 pp.	
2341	11/14/2016	http-www.rdlegalcapital.com- 2016-11-14T23-14-32Z_0.pdf	RDLC-SEC 940077	Irrelevant; Unreliable
2342	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-contactus.cfm_2016-11-14T23-35-33Z.pdf	RDLC-SEC 941418	Irrelevant; Unreliable
2343	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-disclaimer.cfm_2016-11-14T23-35-45Z.pdf	RDLC-SEC 941420	Irrelevant; Unreliable
2344	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-termsofuse.cfm_2016-11-14T23-36-01Z.pdf	RDLC-SEC 941422	Irrelevant; Unreliable
2345	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-general_fun_2016-11-14T23-16-52Z.pdf	RDLC-SEC 941429	Irrelevant; Unreliable
2346	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-special_opp_2016-11-14T23-34-14Z.pdf	RDLC-SEC 941441	Irrelevant; Unreliable
2347	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-sec_registr_2016-11-14T23-31-45Z.pdf	RDLC-SEC 941443	Irrelevant; Unreliable
2348	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-flagship_fu_2016-11-14T23-32-39Z.pdf	RDLC-SEC 941450	Irrelevant; Unreliable
2349	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-offshore_fu_2016-11-14T23-30-10Z.pdf	RDLC-SEC 941467	Irrelevant; Unreliable
2350	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-investment__2016-11-14T23-30-39Z.pdf	RDLC-SEC 941469	Irrelevant; Unreliable
2351	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm_2016-11-14T23-16-33Z.pdf	RDLC-SEC 941471	Irrelevant; Unreliable
2352	11/14/2016	CollectionReport_http-www.rdlegalcapital.com- 2016-11-14T23-14-32Z_pd	RDLC-SEC 941478	Irrelevant; Unreliable
2353	11/14/2016	CollectionReport_http-www.rdlegalcapital.com-index.cfm-p-domestic_fu_2016-11-14T23-29-34Z.pdf	RDLC-SEC 941485	Irrelevant; Unreliable
2354	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-general_fund_info_2016-11-14T23-16-52Z_0.pdf	RDLC-SEC 940070	Irrelevant; Unreliable
2355	11/14/2016	http-www.rdlegalcapital.com-index.cfm_2016-11-14T23-16-33Z_0.pdf	RDLC-SEC 940075	Irrelevant; Unreliable
2356	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-domestic_fund_docs_2016-11-14T23-29-34Z_0.pdf	RDLC-SEC 940068	Irrelevant; Unreliable
2357	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-investment_manager_2016-11-14T23-30-39Z_0.pdf	RDLC-SEC 940071	Irrelevant; Unreliable
2358	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-offshore_fund_docs_2016-11-14T23-30-10Z_0.pdf	RDLC-SEC 940072	Irrelevant; Unreliable
2359	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-sec_registration_2016-11-14T23-31-45Z_0.pdf	RDLC-SEC 940073	Irrelevant; Unreliable
2360	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-flagship_funds_2016-11-14T23-32-39Z_0.pdf	RDLC-SEC 940069	Irrelevant; Unreliable
2361	11/14/2016	http-www.rdlegalcapital.com-index.cfm-p-special_opportunities_fund_2016-11-14T23-34-14Z_0.pdf	RDLC-SEC 940074	Irrelevant; Unreliable
2362	11/14/2016	http-www.rdlegalcapital.com-contactus.cfm_2016-11-14T23-35-33Z_0.pdf	RDLC-SEC 940066	Irrelevant; Unreliable
2363	11/14/2016	http-www.rdlegalcapital.com-disclaimer.cfm_2016-11-14T23-35-45Z_0.pdf	RDLC-SEC 940067	Irrelevant; Unreliable
2364	11/14/2016	http-www.rdlegalcapital.com-termsofuse.cfm_2016-11-14T23-36-01Z_0.pdf	RDLC-SEC 940076	Irrelevant; Unreliable
2365	11/15/2016	R. Dersovitz email to D. Schall, P. Alcantara; cc L. Zheng, A. Hirsch re Audit Disclosure	1 p.	
2366	11/15/2016	R. Dersovitz email to L. Zheng, P. Alcantara, Kathy Jesson; cc D. Schall, A. Hirsch re Language in the financial about the SEC	5 pp.	
2367	11/18/2016	Epiq Letter to Court - Forrest in Peterson	5 pp.	Irrelevant; Unreliable
2368	11/18/2016	Locke Lord Trustee Letter to Court - Forrest in Peterson	5 pp.	Irrelevant; Unreliable
2369	11/21/2016	Ying Zhu, Marcum LLP email to Linda Zheng, R. Dersovitz, Patric Wisard; cc P. Alcantara, D. Schall, T. Catalina, Z. Bird re Audited Financial Statements and RD Offshore and Offshore Unit Trust with attachments	90 pp.	
2370	11/30/2016	Chart entitled In the Matter of RD Legal Capital, LLC, NY-927E	7 pp.	
2372	12/5/2016	R. Dersovitz email to D. Schall with attachment - 2/28/2012 website posting	2 pp.	Unreliable
2373	12/5/2016	R. Dersovitz email to D. Schall with attachment - 02.28.12 Citibank Temporary Limit Increase	2 pp.	Unreliable
2374	12/5/2016	Z. Bird email to IND-Valuation Group; cc A. Banks, P. Alcantara, D. Schall re RD Legal Finance, LLC KPMG Valuation with attachment	8 pp.	Unreliable
2376	12/8/2016	Subpoena to Produce Documents to RD Legal Capital, LLC	6 pp.	Irrelevant
2377	12/31/2016	Net Revenue and Expenses From Operation of Legacy Funds 201f	1 pg.	Unreliable
2378	12/31/2016	Net Draw to R. Dersovitz from Combined Operating Companies	1 pg.	Unreliable
2379	12/31/2016	Net Revenue and Expenses from Operation of Funds - 2012 - 201f	6 pp.	Unreliable
2380	12/31/2016	RD Legal Peterson Cash Flows	RDLC-SEC 1004771	Unreliable
2385	1/9/2017	Subpoena Duces Tecum to Appear and Testify at Deposition and Produce Documents to Arthur Sinensky	2 pp.	Irrelevant
2389	1/13/2017	Locke Lord letter from Shalom Jacob to Hon. Katherine Forrest, in Peterson v. Islamic Republic of Iran, Case No. 1:10-cv-04518-KBF, Document 704	8 pp.	Irrelevant
2393	1/27/2017	Expert Report of David X. Martin	56 pp.	Unreliable
2394	2/14/2017	"Eyes" on Respondents' Valuation Process	1 pp.	Unreliable
2395	2/7/2017	Fay Law Group Letter to Sporkin in Peterson	2 pp.	Irrelevant
2396	2/13/2017	Amended Expert Report of Leon M. Metzger	69 pp.	Unreliable
2397	Undated	The Perles Law Firm, PC Case Inventory - current as of 1/24/17	1 pp.	
2398	Undated	RD Legal Funding Offshore Fund, Ltd. Subscription Instructions for U.S. Tax-exempt Entities and Subscription Agreement and Revocable Proxy for U.S. Tax-exempt Entities signed by R. Dersovitz, A. Sinensky, Mary K. Himij, and Debra Oremland	14 pp.	
2399	Undated	RD Legal Capital, LLC Trade References	2 pp.	
2400	Undated	RD Legal Capital LLC CONFIDENTIAL OVERVIEW Alpha Generation and Process	27 pp.	
2403	Undated	RD Legal Funding Partners Instructions to Subscription Agreement	SECLIT-EPROD-000705209 - 225	
2404	Undated	RD Legal Funding Offshore Fund, Ltd. Subscription Instructions for U.S. Tax-exempt Entities	SECLIT-EPROD-000705269 - 289	
2405	Undated	RD Legal Capital, LLC Investment Examples	SECLIT-EPROD-000705393 - 398	

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Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2407	Undated	RD Legal Capital Frequently Asked Questions	RDLC-SEC 622602	
2408	Undated	Memorandum of Terms for Private Placement of RD Legal Special Opportunities Fund L.P. and RD Legal Special Opportunities Fund L.P. Ltd	RDLC-SEC 655917 - 919	
2409	Undated	RDLFP 2012 Subscription Agreement	RDLC-SEC 665109	
2412	25/2013; 10:50	E-mail. From: E. Robak, To: R. Dersovitz, L. Zatta	PVA0009679	
2413	1/5/2014; 2:01 P	E-mail. From: E. Liu, To: L. Zatta	RDLC-SEC 065587	
2414	5/2013; 5:22 P	E-mail. From: Ronni Gussin, To: E. Robak, Cc: E. Liu, with Subject; Re: retainer letter attached.	PVA0028695	
2415	29/2008	Guaranty	RDLC-SEC 097581	Irrelevant
2416	4/31/16	Fay Repurchase Offer (April 31 2016)	SECLIT- EPROD000719146-47	
2417	6/30/14	Independent Accountant's Report on Applying Agreed Upon Procedures 2Q2014	RDLC-SEC 054559	Irrelevant; Unreliable
2418	4/2015; 5:49 P	E-mail. From: R. Dersovitz, To: E. Robak, with Subject	PVA0002050	
2419	2/4/2015; 4:47 A	Email from P. Wisard to Robak	PVA0002882	
2420	Undated	Memorandum of Terms	RDLC-SEC 091321	
2421	Undated	List of Amy Hirsch's speaking engagements	RDLC-SEC 1006704	Irrelevant
2422	Undated	RD Legal Flow Chart of Cash Movement	RDLC-SEC 940392	Unreliable, Irrelevant
2423	Undated	RDLC - Privacy Notice	RDLC-SEC 940553	Unreliable, Irrelevant
2424	Undated	W-8BEN- Certificate of Foreign Status	RDLC-SEC 940555	
2425	Undated	Email Communication regarding Liquidation Account	RDLC-SEC 940712	Unreliable, Irrelevant
2426	Undated	Wiring Instructions	RDLC-SEC 940722	
2427	Undated	W9- Request for Taxpayer Identification Number & Certification	RDLC-SEC 940794	
2428	Undated	Wire Information	RDLC-SEC 940802	
2429	Undated	Subscription Instructions for U.S. Tax Exempt Entities	RDLC-SEC 940980	
2430	Undated	Subscription Instructions for Non U.S. Persons	RDLC-SEC 941001	
2431	Undated	Instructions to Subscription Agreement	RDLC-SEC 941057	
2432	Undated	RD Legal Special Opportunities Offshore Fund I, Ltd - Subscription Booklet	RDLC-SEC 941219	Irrelevant
2433	Undated	RD Legal Special Opportunities Partners I, LP - Subscription Booklet	RDLC-SEC 941356	Irrelevant
2434	Undated	RD Legal Special Opportunities Partners I, LP - Additional Subscription	RDLC-SEC 942394	Irrelevant
2435	Undated	RD Legal Special Opportunities Offshore Fund I, Ltd - Additional Subscription	RDLC-SEC 943622	Irrelevant
2436	Undated	Handwritten notes	PVA0000175, PVA0000186- 87,PVA0000166	Unreliable
2437	Undated	CD of two spreadsheets	PVA0008333	
2438	N/A	Undated Amy Hirsch's Engagement Letter with RD Legal	(none provided)	
2439	Undated	Terrorist Assets Report, Calendar Year 2009	RDLC-SEC 232694 - 727	
2440	Undated	Terrorist Assets Report, Calendar Year 2010	RDLC-SEC 232728 - 761	
2441	Undated	RD Legal Capital 4Q2014 Portfolio Statistics	RDLC-SEC 270263	
2442	Undated	Table of cases	SECLIT-EPROD- 000028486	
2443	Undated	R. Dersovitz letter to K. Markovic re employment	SECLIT-EPROD- 000028616	
2444	Undated	Draft document entitled "Osborn Law, P.C."	SECLIT-EPROD- 000067846 - 847	Unreliable
2445	N/A	Undated Demonstrative of meetings with investors from the Tiger 21 group and allocations re: same	(none provided)	
2446	Undated	List of Iran Claims	(none provided)	Unreliable
2447	Undated	RDLFOF Investors	(none provided)	
2450	N/A	Reserved for Demonstrative	(none provided)	
2451	N/A	Reserved for Demonstrative	(none provided)	
2452	N/A	Reserved for Demonstrative	(none provided)	
2453	N/A	Reserved for Demonstrative	(none provided)	
2454	N/A	Reserved for Demonstrative	(none provided)	
2455	N/A	Reserved for Demonstrative	(none provided)	
2456	N/A	Reserved for Demonstrative	(none provided)	
2457	N/A	Reserved for Demonstrative	(none provided)	
2458	N/A	Reserved for Demonstrative	(none provided)	
2459	N/A	Reserved for Demonstrative	(none provided)	
2460	N/A	Reserved for Demonstrative	(none provided)	
2461	N/A	Reserved for Demonstrative	(none provided)	
2462	N/A	Reserved for Demonstrative	(none provided)	
2463	N/A	Reserved for Demonstrative	(none provided)	
2464	N/A	Reserved for Demonstrative	(none provided)	
2465	N/A	Reserved for Demonstrative	(none provided)	
2466	N/A	Reserved for Demonstrative	(none provided)	
2467	N/A	Reserved for Demonstrative	(none provided)	
2468	N/A	Reserved for Demonstrative	(none provided)	
2469	N/A	Reserved for Demonstrative	(none provided)	
2470	N/A	Financial Disclosure Form re Inability to Pay Defense	(none provided)	
2471	8/2/2013	P. Laroche email to E. Liu; cc Kyle Burdette, L. Zatta re July 2013 FV information for valuation with attachment	RDLC-SEC 059373	
2472	8/2/2013	L. Zatta email to P. Laroche, E. Liu; cc K. Burdette re July 2013 Fv	RDLC-SEC 072213 -	
2473	12/3/2012	L. Zatta email to D. Schall; cc E. Robak, R. Dersovitz re Accounting	RDLC-SEC 077739 -	
2474	2/5/2013	R. Gussin email to E. Robak; cc E. Liu re Invoice	PVA0028712	
2475	1/14/13	L. Zatta email to E. Liu; cc E. Robak, P. Laroche, R. Dersovitz and earlier emails re Valuation - Osborn positions with attachments	RDLC-SEC 067701	
2476	2/28/2013	Anthony Banks, Marcum Advisory Group memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2012	Marcum_RDLegalCapital _00004337 - 339	Unreliable
2477	2/28/2013	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2012	Marcum_RDLegalCapital _00004340 -343	Unreliable

*The Division's categorical objections to Respondents' exhibits are set forth in the accompanying Motions in Limine of the Division.

Division of Enforcement Objections to Respondents' Exhibit List as of March 8, 2017

Trial Exh. No.	Doc. Date	Document Description	Bates	Specific Objections*
2478	2/28/2013	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2012	Marcum_RDLegalCapital_00004244-247	Unreliable
2479	2/28/2013	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2012	Marcum_RDLegalCapital_00004217-220	Unreliable
2480	2/28/2014	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_00004260 - 263	Unreliable
2481	2/9/2015	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_00004280 - 283	Unreliable
2482	2/9/2016	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_0010660-663	Unreliable
2483	2/9/2016	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_00004300 -303	Unreliable
2484	2/9/2016	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_0000636-639	Unreliable
2485	2/9/2016	A. Banks memo to RD Legal Funding Partners, LP re RD Legal Funding Partners, LP - Value of the loan portfolio as of December 31, 2014	Marcum_RDLegalCapital_0001601-604	Unreliable
2486	6/8/2010	Peterson v. Islamic Rep. of Iran , USDC, Southern District of New York, Case No. 10-cv-4518, Amended Complaint	(none provided)	
2487	9/23/2009	Transcript of Ordinary Court in Rome, Office of Presidency re Rogatory commission of the Judicial Authority of the United States of Americæ	(none provided)	Unreliable
2488	8/21/2012	R. Dersovitz email response to J. Riley re Is RDLFP open for additional investment? With attachment	RDLC-SEC 532077 - 079	
2489	1/26/2013	K. Markovic email to R. Slifka; cc R. Dersovitz re Iran with attachments	RDLC-SEC 643765 - 773	
2490	1/27/13	K. Markovic email to R. Slifka and earlier emails re Follow up with attachments	SECLIT-EPROD-000695442 - 451	

*The Division's categorical objections to Respondents' exhibits are set forth in the accompanying Motions in Limine of the Division.

Exhibit B

1 APPEARANCES:

2

3 On behalf of the Securities and Exchange Commission:

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5 VICTOR SUTHAMMANONT, ESQ.

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21

22

23

24

25

1 different issues. Including the Iran case which
2 you've probably saw discussed in the OIP or the
3 answer.

4 So there's a significant amount of -- given
5 the nature of this fund and the types of things they
6 invested in there is a significant amount of
7 communication with outside attorneys that the
8 Respondents relied upon. Many of those
9 communications the company did not maintain a
10 privilege over.

11 So, for example, there were very
12 substantive legal memos from Reed Smith regarding
13 the -- either the Iran case that is at the center of
14 this OIP, those have been provided to the staff and
15 to investors as well. So that is an example where
16 lawyers, professionals in their field, gave advice to
17 Respondents and Respondents acted upon that advice.

18 Now, we could argue at a more academic
19 level, does this fall within a reliance on counsel
20 defense or is this part of showing compliance with a
21 prudent standard to care. We can't say exactly, but
22 those are the types of things where I think it is --
23 the Respondents fairly relied upon outside
24 professionals and that is part of what we view as the
25 reliance that we disclosed in the answer.

1 MR. WILLINGHAM: Your Honor, this is Mr.
2 Willingham.

3 We -- we had a call, as you know, in
4 advance of the call today with the Division and we
5 discussed that issue. And the Division informed us
6 that they would be seeking to put on live witnesses
7 for the most part. And we put them on notice that we
8 would be objecting if we were prevented a chance to
9 cross-examine the witnesses. That would be, in our
10 view, a violation of our due process rights, number
11 one.

12 Number two, we believe just from the
13 intense factual nature, this is a case, Your Honor,
14 where multiple disclosures were made regarding these
15 very same issues in writing to all of the investors
16 and the Division has taken the position that despite
17 those written disclosures, oral statements to
18 investors at various stages of the proceedings that
19 are at issue, in fact, trump that. And so, we are
20 going to need the chance to cross-examine each and
21 every one of those potential declarants and/or
22 witnesses that the Division puts on. That's one
23 issue. We think that that's really important to us.

24 And then I want to circle back, Your Honor,
25 to the issue of experts.

1 we're headed in that direction where we all feel the
2 same way anyway. Some of that will depend on witness
3 availability. I'm sure we'll have to deal with that
4 going forward, but as of right now we intend to issue
5 a subpoena to anybody that we understand is going to
6 be a declarant or a witness for the SEC -- for the
7 Division.

8 With regard to just the issue of discovery
9 and experts in general, Your Honor, one issue we did
10 raise with the Division on the call and that we ask
11 the court to consider is with regard to experts.

12 There appear to be, at least for us, a number of
13 experts that we're going to want to put on that I'm
14 sure the Division is going to want to depose. And
15 I -- we understand anyway that the Division may have
16 an expert or two waiting in the wings. Given the
17 large number of witnesses, we'd ask that we be given
18 the right to take five depositions under the new rule
19 of the fact witnesses and that the expert depositions
20 or expert witnesses that we have a right to depose
21 them separate and apart.

22 It shouldn't add too much in terms of the
23 total number of depositions. Maybe one or two for
24 the Division. Two or three for us. We're willing
25 to, of course, do the same thing for them, but in

Exhibit C

September 30, 2016

Hon. Carol Fox Foelak
Administrative Law Judge
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Re: *In the Matter of RD Legal Capital, LLC, et al.*
Administrative Proceeding No. 3-17342

Dear Judge Foelak:

We represent RD Legal Capital, LLC and Roni Dersovitz (“Respondents”) in the above matter. Respondents respectfully oppose the September 16, 2016 request of the Division of Enforcement (the “Division”) for subpoenas to be issued in this matter (Attachment A). As set forth below, the subpoenas the Division requests (“Requested Subpoenas”) are unreasonable, oppressive, excessive in scope, and unduly burdensome.¹

We believe it is important to put the current request of the Division into context. During a more than year-long investigation, the Division requested, and Respondents provided, approximately one million pages of documents through 38 separate productions. The Division also received an additional one million pages of documents from third parties. After having filed this administrative proceeding—and thus indicating to the Court and public that it was prepared to move forward on an expedited basis—the Division now seeks to compel additional discovery from Respondents. The information the Division now requests is either duplicative of earlier requests from the investigation or shockingly broad in scope and burdensome.

Specifically, the Requested Subpoenas seek to compel: (i) all documents relating to any communications concerning *any* legal advice requested by, or provided to, Respondents on *any* issue regarding Respondents’ funds over a more than five-year period; (ii) documents sufficient to demonstrate Respondents’ financial condition as of July 14, 2016; and (iii) all notes taken by

¹ See 17 C.F.R. § 201.232(b); see, e.g., *Order Granting in Part and Denying in Part Subpoena Request*, Admin. Proc. File Nos. 3-14872, 3-15116 (June 26, 2013) (Elliot, ALJ) (denying portions of Division’s subpoena request and noting that the request “reads like a discovery request” and “it is puzzling why some of the requested documentation was not at least requested during the investigation leading to this proceeding”).

one of Respondents' employees during the course of her employment. Two of these requests seek information already provided in the investigation, and the third is hopelessly overbroad. Respondents should not be burdened with responding to this excessive and duplicative discovery at a time when they are preparing to present their case in chief. The Court should decline to issue the Requested Subpoenas.

I. Request Related to Respondents' Reliance on Professionals

All documents relating to any legal advice requested by, or provided to, [Respondents] concerning any communications since June 2011 regarding RD Legal Funding Partners, LP, RD Legal Funding Offshore Fund, Ltd., RD Legal Funding Special Opportunities Fund, L.P., or RD Legal Special Opportunities Fund L.P. Ltd. ("Funds"), including, without limitation, any offering memoranda, marketing materials or other written or oral communication regarding the funds.

n.2: To the extent [Respondents] claim[] any privilege over documents described herein, the Division seeks a log identifying the subject matter of any withheld documents, the author(s) and recipient(s) of such documents, and the date of such documents.

Respondents object to the sheer breadth of this request and the immense burden it would place on them to respond during the time they are preparing for the hearing on the merits.² Both RD Legal Capital, LLC and Mr. Dersovitz have consulted numerous attorneys and law firms over the past five years concerning any number of issues regarding the funds. Indeed, the privilege log produced to the Division during the investigation identified more than 200 attorneys with whom Respondents had privileged communications during the time in question. That privilege log was prepared following a long review of Respondents' electronic files—at significant cost to Respondents—to identify information responsive to specific requests from the Division. The information the Division now seeks, which is unlimited as to subject matter, is even broader in scope.

In this request, the Division seeks to invade the attorney-client privileges of Respondents, pulling in communications outside the scope of any issues raised in the case. It would be extremely burdensome—and unnecessary—for Respondents to identify, collect, and produce documents relating communications concerning *any* legal advice requested or received on *any* issue affecting the funds since June 2011. It would be equally burdensome—and unnecessary—for Respondents to have to prepare a privilege log covering all such legal communications conducted during this five-year period.

² See 17 C.F.R. § 201.232(b); see, e.g., Order on Subpoenas, Admin. Proc. File No. 3-14848 (Aug. 20, 2012) (Murray, Chief ALJ) (denying motion for issuance of a subpoena as "unreasonable, excessive in scope, and unduly burdensome" because, inter alia, the subpoena would require a party to undertake data collection just as it is preparing its case in chief); Order on Application to Quash, Admin. Proc. File No. 3-14697 (Apr. 27, 2012) (Murray, Chief ALJ) (finding subpoena requests unreasonable and unduly burdensome because gathering the requested information would take weeks or months).

In a September 12, 2016 letter to the Court, the Division argued it “is entitled to know whether Respondents are claiming reliance on counsel as a defense to the allegations in the OIP.” We agree. That is why Respondents identified reliance on professionals as an additional defense in their answer, thus discharging their obligation under amended Rule 220. The Division is entitled to nothing more under the Rules of Practice. It certainly is not entitled to compel Respondents to search for *any* document related to *any* advice concerning *any* legal issue over a five year period. The request for an issuance of subpoenas on this issue should be denied.

II. Request for Notes of Katarina Markovic³

All notes taken by Katarina Markovic in the course of her employment by RD Legal Capital, LLC or any affiliated entity or fund concerning any business conducted, investments made by, or communications concerning RD Legal Funding Partners, LP or RD Legal Funding Offshore Fund, Ltd.

n.1: The Division only seeks responsive materials not previously provided to the staff.

Respondents already produced the notes of Katarina Markovic in response to a subpoena dated February 8, 2016 (Attachment B). During a meet-and-confer telephone conference, the Division requested that Respondents review and produce unredacted copies of certain notes of Ms. Markovic that had been previously redacted for lack of responsiveness. Respondents subsequently produced the requested notes in unredacted form and provided the Division with an updated privilege log. The Division then requested that Respondents provide a more detailed privilege log concerning the notes that were redacted for attorney-client privilege to identify the specific legal counsel participating in the communications. Respondents have updated their privilege log with this additional information and are providing the updated log to the Division today.

The request for a subpoena for Ms. Markovic’s notes thus seeks information the Division has already asked for and already received. There is no reason to go through this exercise again. The request for an issuance of subpoenas on this issue should therefore be denied.

III. Request Related to Monetary Relief Sought

Documents sufficient to demonstrate [Respondents’] financial condition as of July 14, 2016.

³ This request is directed to RD Legal Capital, LLC only. Ms. Markovic is the head of investor relations for Respondents.

The Division requests information related to the financial condition of Respondents. This request would largely only supplement information provided to the Division during the investigation. For the reasons set forth below, Respondents respectfully ask that this request be denied at this time.

During the telephonic initial hearing on August 22, 2016, the Court directed the Division to provide Respondents the amount of any monetary remedies the Division seeks against them in this case. The Court indicated that this was required because, if Respondents were to argue an inability to pay such remedies, they would need to present evidence of that inability at the hearing.

Following the hearing, the Division sent a letter to Respondents on August 25, 2016 in which it indicated the Division would seek a staggering \$42,690,680 in disgorgement from Respondents, including \$7,969,209 in disgorgement against Mr. Dersovitz personally, plus “additional profits” and tier three penalties. These figures, frankly, are detached from any reasonable interpretation of the factual record in this case. Not knowing what to make of these picked-from-the-sky numbers, it is difficult for Respondents to even evaluate their need to put forth a showing of an inability to pay.

Respondents feel confident they will prevail on the merits in this case. That aside, even if we assume for argument there was a finding of liability, there is no rational justification for the disgorgement figures stated above. For example, the net draw to Mr. Dersovitz—from whom the Division seeks nearly \$8 million—for his operation of the investor funds during the subject period of the complaint (2011 to present) averaged less than \$750,000 annually. As the Division knows from information provided during the investigation, since the time when the funds entered a period of illiquidity in mid-2015, Mr. Dersovitz has committed his own personal capital to sustain the ongoing operation of the funds and to pay the necessary expenses (payroll, payroll taxes, legal fees, insurance, rent, etc.) to preserve the funds’ assets. These facts were well discussed and well documented during the investigation. The Division can make no showing Mr. Dersovitz received \$7.9 million in “gains” during the period of the complaint, much less that they were ill-gotten.

Moreover, there is no basis for the Division to seek third-tier penalties against Respondents. As the Court understands, tier three penalties require a showing of substantial losses, or risks of such losses, to investors. In this case, there were *no losses* to investors, much less substantial ones. In fact, all of the investors in Respondents’ funds have realized significant double-digit compounded annual returns from their investments. The Division’s statement that it will nonetheless seek tier three penalties in this case simply ignores the remedies structure created by Congress.

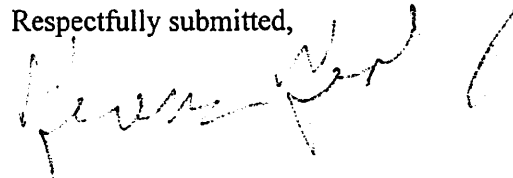
During the investigation, the Division received a significant amount of data regarding the financial condition of Respondents. Mr. Dersovitz provided account statements and spreadsheets detailing the balances of all personal accounts held by himself or his wife, as well as information regarding other assets in which he holds interests. RD Legal Capital, LLC provided essentially all

Hon. Carol Fox Foelak
September 30, 2016
Page 5 of 5

of its financial records to the Division, including its complete QuickBooks accounting system in native form. The Division also subpoenaed directly all records for Respondents' bank accounts from various financial institutions. This information should be sufficient for the needs of the Division at this time.

As stated above, Respondents do not believe there is a factual basis for the amounts the Division seeks in disgorgement, and neither a factual nor legal basis for the requested penalties. For these reasons, Respondents respectfully suggest that the Court bifurcate from the hearing on the merits any presentation by Respondents, if needed, of an inability to pay. Respondents further respectfully request that any additional discovery on the financial condition of Respondents be deferred until such time as it may be needed. Respondents therefore ask that the request for an issuance of subpoenas on this issue be denied at this time.

Respectfully submitted,



Terence Healy

Attachments

cc: David K. Willingham (email only)
Michael D. Roth (email only)
Michael Birnbaum (email only)
Jorge Tenreiro (email only)
Victor Suthammanont (email only)

Exhibit D

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17342

In the Matter of

RD LEGAL CAPITAL, LLC and
RONI DERSOVITZ

**FIRST AMENDED LIST OF
POTENTIAL EXPERT
WITNESSES OF RESPONDENTS**

RD Legal Capital, LLC and Roni Dersovitz (“Respondents”) provide the following list of witnesses they may call to testify at the hearing who may offer testimony in the form of opinions based on scientific, technical, or specialized knowledge.

<i>Witnesses Who Have Been Retained Or Specially Employed To Provide Expert Testimony In This Matter</i>		
1.	David X. Martin	5 Sutton Place South, Lawrence, New York, NY 11559
2.	Leon M. Metzger	4551 Livingston Avenue, Bronx, New York 10471-3911

*Witnesses Who Have Not Been Retained Or Specially Employed To Provide
Testimony In This Matter But Who May Testify At The Hearing In The
Form Of Opinion Based On Scientific, Technical,
Or Specialized Knowledge*

1.	Leslie Adler	Marcum LLP, 750 3rd Avenue, 11th Floor, New York, NY 10017
2.	David Backens	Certis Capital Management, Inc., 38 El Paseo Building, Santa Barbara, CA 93101
3.	David J. Bird	c/o Reed Smith LLP, 225 Fifth Avenue, Pittsburgh, PA, 15222
4.	Todd Dawes	Certis Capital Management, Inc. 38 El Paseo Building, Santa Barbara, CA 93101
5.	Roni Dersovitz	RD Legal Funding, LLC, 45 Legion Dr., Cresskill, NJ 07626
6.	Frank Franiak	Woodfield Fund Administration LLC, 1 North Wacker, Suite 2150, Chicago, IL 60606
7.	Scott Gottlieb	c/o Pullman & Comley LLC, 107 Elm Street, Four Stamford Plaza, 5th Floor, Stamford, CT 06902-3834
8.	Amy Hirsch	RD Legal Group, LLC, 1370 Avenue of Americas, New York, NY 10019
9.	Travis Hutchinson	HHM Wealth Advisors, LLC, 1200 Market Street Chattanooga, TN 37402
10.	Thomas Lowe	The Maclellan Foundation, Inc., 820 Broad Street #300, Chattanooga, TN 37402

11.	Katarina Markovic	RD Legal Group, LLC, 1370 Avenue of Americas, New York, NY 10019
12.	James C. Martin	Reed Smith LLP, 225 Fifth Avenue, Pittsburgh, PA, 15222
13.	Daniel Osborn	Osborn Law PC, 43 West 43rd Street, Suite 131, New York, NY 10036
14.	Lance Paddock	Thompson Creek Wealth Advisors, LLC, 804 Main Street, Baton Rouge, LA 70802
15.	Espen Robak	Pluris Evaluation Advisors, 61 Broadway, Suite 1000, New York, NY 10006
16.	Dennis Schall	Marcum LLP, 750 3rd Avenue, 11th Floor, New York, NY 10017
17.	Joel M. Simon	Smith Mazure, PC, 111 John Street, 20th Floor, New York, NY 10038
18.	Corey A. Tavel	Smith Mazure, PC, 111 John Street, 20th Floor, New York, NY 10038
19.	Kyle Vataha	Pluris Evaluation Advisors, 61 Broadway, Suite 1000, New York, NY 10006
20.	Leo Zatta	c/o Cahill Gordon & Reindel LLP, 1990 K St NW, Washington, DC 20006

For those witnesses who have been retained or specially employed to testify in this matter, Respondents will provide the disclosures required for those witnesses under Rule of Practice 222 at the time designated by the Court.

Dated: December 23, 2016

Respectfully submitted,

/s/

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Terence M. Healy
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Counsel for Roni Dersovitz

Exhibit E

1 THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION
 2
 3 In the Matter of:)
 4) File No. NY-09279-A
 5 RD LEGAL CAPITAL, LLC)
 6
 7 WITNESS: Roni Dersovitz
 8 PAGES: 163 through 377
 9 PLACE: Securities and Exchange Commission
 10 New York Regional Office
 11 200 Vesey Street
 12 Suite 400
 13 New York, New York 10281
 14 DATE: Friday, January 29, 2016
 15
 16 The above-entitled matter came on for hearing,
 17 pursuant to notice, at 10:36 a.m.
 18
 19
 20
 21
 22
 23
 24 Diversified Reporting Services, Inc.
 25 (202) 467-9200

1 APPEARANCES:
 2
 3 On behalf of the Securities and Exchange Commission:
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 14 On behalf of the Witness:
 15 TERENCE HEALY, ESQ.
 16 CHARLES ZITZMANN, ESQ.
 17 LOCKE LORD, LLP
 18 701 8th Street, N.W.
 19 Suite 700
 20 Washington, DC 20001
 21 (202) 779-0890
 22
 23 ALSO PRESENT:
 24 Ian Schwartz, SEC Intern
 25 Joshua Saturn, SEC Intern

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3	WITNESS:	EXAMINATION
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1 question and I'm not taking it that way. We reserved one
2 third of origination for a vehicle that was controlled by
3 RD Legal Capital. Then, the two other counter parties
4 were permitted to originate their capacity. In connection
5 with one of those, we earned a fee.
6 Q By "we," you mean?
7 A The IM -- not the IM, RD Legal Funding earned a
8 fee, which I then assigned -- obviously, it's subject to
9 collection -- but which I assigned to the particular
10 series -- I'm not going to go through the whole thing
11 again -- but the particular series that I described in RD
12 Legal Finance. It, in turn, issued a note that was
13 acquired by CCY.
14 Q I'm a little slow with this. The other two
15 entities that were a third, a third, a third, were Cedar?
16 A And Specialty Funding.
17 Q It's not --
18 A Neither one are LD. They are both independent,
19 totally independent.
20 Q I think it's Exhibit-7, if can we go back to
21 that one.
22 Do you see some sales of Iran plaintiff's claims
23 to Cedars Funding here?
24 A Yes.
25 Q Is that the same thing or is that something

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1 else?
2 A It was this, plus a lot more.
3 Q So you originated other new ones, essentially --
4 A Yes.
5 Q -- for this transaction?
6 A These, plus a lot more.
7 BY MR. BIRNBAUM:
8 Q Just because there is gestures on the record,
9 they, Cedar, took what's reflected in Exhibit-7, plus a
10 lot more.
11 A Then they originated, freshly, new claims.
12 MR. HEALY: Exhibit-7, it's sales from the fund.
13 THE WITNESS: Right.
14 MR. HEALY: It's either assets that were held by
15 the fund --
16 BY MR. TENREIRO:
17 Q Some where sold also to Constant Cash Yield,
18 that's a separate thing?
19 A Yes. That are the sales through the special
20 vehicle -- through the special purpose vehicles, they also
21 participated in about 30 plus million from the flagship
22 vehicle.
23 Q Let's go to the vehicle that we're talking
24 about, a third, a third, a third and a note that was
25 purchased by Constant Cash Yield.

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1 A Yes.
2 Q So they purchased a note over the assets, the
3 pooled assets?
4 A No. They purchased a note that was the
5 receivable. So the underlying collateral for the note was
6 the receivable for my fee, a portion of my fee, in
7 connection with the origination for Cedars Funding.
8 Q Okay. And this is what the \$2 million reflects
9 in this?
10 A It's a portion, yes. It's a portion of that
11 fee. It's a portion of the fee that I will earn.
12 Q What's the total fee?
13 A It'll be subject to collection, but it will
14 exceed \$2 million.
15 Q Tell me how much it's going to be.
16 A I'm not sure.
17 Q So what happened with this \$2 million that you
18 got from CCY here?
19 A I used most of it to support the business.
20 Q So is this reflected in the draws we just talked
21 about?
22 A No. It's possibly -- when did that --
23 MR. HEALY: It's not a draw.
24 THE WITNESS: That's not a draw.
25 BY MR. TENREIRO:

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1 Q Is this reflected in the capital commitments?
2 A When did that happen?
3 Q October 2015, please look at Exhibit-29.
4 A That's through November, so part of it might be,
5 but there have been more.
6 Q So this is basically a fee that you sold from
7 the origination of some Iran claims?
8 A Unrelated to any of the legacy funds.
9 Q Fair enough.
10 BY MR. BIRNBAUM:
11 Q Is that yes, unrelated to any of the legacy
12 funds?
13 A Unrelated -- the fee that I earned is unrelated
14 to anything in connection with the legacy fund. It's for
15 other assets. It's for other Iranian assets, nothing to
16 do with anything that is done by the funds.
17 BY MR. TENREIRO:
18 Q Assets that you originated for other individuals
19 not related to the legacy fund?
20 A Correct.
21 (SEC Exhibit No. 30 was marked
22 for identification.)
23 BY MR. TENREIRO:
24 Q Have you had a chance to look at Exhibit-30?
25 A Yes.

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1 Q Do you recognize this as an email exchange
2 between yourself and individuals at Clarus?
3 A Yes.
4 Q And Clarus is the valuation company for the
5 legacy funds?
6 A Yes.
7 Q Do you see where they say, on the front page of
8 the email, number two: We projected \$125 million to \$200
9 million of special investment vehicle capital?
10 A Yes.
11 Q Did the special investment vehicle cap actually
12 generate this much capital?
13 A No. This was done for a estate planning
14 purposes in connection with the business valuation, that's
15 all.
16 Q Okay. What do you mean by that?
17 A Exactly what I said, estate planning purposes,
18 valuation on a business -- I think that's what this is
19 for. I'm not sure, valuing the business.
20 Q Would they value the business differently for
21 estate planning purposes than for purposes uncalculated
22 investor returns?
23 A Yes, totally. It's a different calculation.
24 Q In what sense?
25 A Valuing the business and the longevity in the

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1 business and other trades. It's a separate topic.
2 Q Well, would they use the same methods to value
3 the underlying assets?
4 A No, sir.
5 Q How would they be different?
6 A You are looking at the earning capacity of the
7 manager. It has nothing to do with the individual assets.
8 Q You see number four, it says: We incorporated
9 \$2 million of annual CEO compensation. Do you see that?
10 A Yes.
11 Q What's the basis for that?
12 A Well, that would be a number that would come
13 out -- if you are valuing a business, the question is how
14 much residual capital is left, so you are valuing those
15 cash flows on a go forward basis. It assumed -- this
16 discussion assumed that I would make a draw of \$2 million
17 a year, has nothing to do with anything on Iran.
18 Q Let's try the next exhibit.
19 MR. HEALY: Can we take a break, please?
20 MR. TENREIRO: Off the record at 5:15.
21 (At this time, a short break was taken.)
22 MR. TENREIRO: Back on the record at 5:19. I
23 understand that there is an issue with what we were trying
24 to mark as Exhibit-31.
25 MR. BIRNBAUM: While we were off the record, we

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1 didn't discuss the substance with the witness, correct?
2 THE WITNESS: Yes.
3 MR. HEALY: Exhibit-31 appears to be a document
4 that would be an attorney/client privilege work product
5 related to some legal services that Mr. Dersovitz has
6 received from an attorney at Reed Smith related to estate
7 planning. We maintain strongly that the document is
8 privileged and should not have been produced and we would
9 seek to claw it back through Clarus counsel and some other
10 means.
11 MR. TENREIRO: That's fine. And we won't
12 introduce it now. If you can kind of follow the issue,
13 formalize it in writing and let us know what the --
14 MR. BIRNBAUM: Just so the record is clear, I
15 know it was referred to as Exhibit-31. This will not be
16 Exhibit-31, so it won't be part of the record. We won't
17 make use of it until you follow up in writing with us.
18 BY MR. TENREIRO:
19 Q So let me just ask you this, Mr. Dersovitz, if
20 we go back to the previous exhibit -- if we go back to
21 Exhibit-30, you see that line that talks about we
22 incorporated \$2 million of annual CEO compensation.
23 Do you see that?
24 A I'm sorry? He's my CFO. It was done in
25 connection with my --

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1 MR. HEALY: We would maintain that these are
2 agents that are being consulted with counsel for the
3 purposes of the business valuation.
4 MR. TENREIRO: You produced this document.
5 MR. HEALY: We seek to claw it back ourselves.
6 THE WITNESS: It's the same thing.
7 MR. TENREIRO: Please put this one in writing
8 also.
9 MR. HEALY: At least give us an opportunity to
10 consider this one -- Exhibit-31, I feel very clear about
11 it. This would be protected attorney/client
12 communication -- attorney work product.
13 MR. SATWALEKAR: Just so the record is clear, we
14 hear you out. We're not agreeing with you that Exhibit-30
15 or 31 -- we hear you out and we look forward to you
16 writing a submission on them.
17 MR. HEALY: Thank you very much.
18 BY MR. TENREIRO:
19 Q In terms of your compensation from the RD Legal
20 entities, do you plan for an earning amount looking
21 forward?
22 A That was what -- what you are indirectly asking
23 about, is a valuation that was being done for gift tax
24 purposes. That's why my counsel has placed the objection
25 on the record and is going to submit written materials to

1 you to claw it back.

2 MR. TENREIRO: Can you read back that question?

3 (At this time, the court reporter read back the
4 last question.)

5 THE WITNESS: God willing, yes.

6 BY MR. TENREIRO:

7 Q How do you do that?

8 A In my head.

9 Q How do you plan for a compensation going
10 forward?

11 A Never with enough certainty, as you can see by
12 my numbers in 2015.

13 Q At any point, have you told anyone at Clarus
14 that your goal is to take out as much as possible from the
15 fund?

16 A My goal is to make what I'm permitted to make
17 under the documents and to live comfortably; no more, no
18 less. This year I am quite happy, but I lost a lot of
19 money. It is what it is.

20 Q Just yes or no.

21 A That's not a yes or a no.

22 Q At any point, did you tell anyone at Clarus that
23 your goal is to take on as much as possible from the fund?

24 A No. My goal is to make a good living and as
25 much as I can. Just like yours, just like everyone else

1 not. I'm asking --

2 A I'm not being cute, Michael. The answer is no.

3 All it's doing -- there is no investor capital being
4 sought for RD Legal Finance. The only thing that it is
5 doing is marketing offerings. Then, it's only technically
6 me.

7 BY MR. TENREIRO:

8 Q And RD Legal Finance Partners is soliciting
9 investor funds, the legacy, domestic --

10 A RD Legal Funding Partners is.

11 Q Is any other entity in the RD Legal family
12 soliciting investors other than that one?

13 A RD Legal Special Investments will be soliciting
14 investors once we work one set of issues out. That is
15 partially when some liquidity will begin to return the
16 domestic vehicles.

17 Q Which investors are you soliciting?

18 A Globally. I'm traveling globally. We already
19 have people that we believe are hopefully going to invest.

20 BY MR. BIRNBAUM:

21 Q Any other RD family entities?

22 A No. Well, RDL SI is technically two vehicles,
23 just to be clear. So it's a master feeder and there is a
24 Delaware, LLC for those investors that don't want to be
25 placed into and a haven jurisdiction and a Cayman, LLC for

1 in this room. This is my business. This is my
2 livelihood. The answer is, from what I do, vis-a-vis the
3 factoring a legal opportunities, I hope to make a fair
4 amount of money.

5 Q I'm just going to ask it one more time.

6 MR. HEALY: He answered. He said no.

7 BY MR. TENREIRO:

8 Q Let's move onto what the current status of the
9 RD Legal entity is.

10 Are the RD Legal entities, legacy fund or the
11 new fund, currently soliciting investors?

12 A The domestic vehicle is soliciting investors,
13 the offshore is not. We're working out several issues on
14 RDL SI, and that vehicle has common units and preferred
15 units. RD Legal Finance is operational.

16 Q Is RD Legal Finance soliciting investors?

17 A No, it's not soliciting any investors. All it's
18 doing is offering issuances.

19 BY MR. BIRNBAUM:

20 Q Is it the same answer for all of those, if we
21 ask anyone -- soliciting investors on any of those
22 entities on behalf -- I don't want to get caught up on
23 whether a person at the company is soliciting or --

24 A Nothing. I'm not being cute, Michael.

25 Q Okay. I'm not asking whether you are cute or

1 those investors that don't want to come into America.

2 It's essentially the same vehicle; ones an LLC, ones an
3 LTD.

4 BY MR. TENREIRO:

5 Q What about any other transactions like the one
6 you just saw with constant cash yield for the sale of your
7 receivable; is there anything else like that that you're
8 planning on doing?

9 A Possibly.

10 Q Anything currently?

11 A I might have a thought after I leave. That's my
12 own receivable. It doesn't impact an investor. I don't
13 want to be put into a position where I say no, not at the
14 moment, but you know what, tomorrow I do. So I don't want
15 to --

16 Q But you are not, today, currently sitting here,
17 engaging in negotiations to sell any parts of your own
18 receivables?

19 A I thought about it and I might.

20 BY MR. BIRNBAUM:

21 Q That wasn't the question. The question was:
22 Are you engaging in any negotiations? Not whether you
23 think about it, not whether you might. The question is,
24 simply: Are you, sitting here today, engaging in any
25 negotiations concerning --

Exhibit F

February 25, 2016

**CONFIDENTIAL TREATMENT REQUESTED BY RD LEGAL CAPITAL, LLC UNDER
17 C.F.R. § 200.83**

VIA E-MAIL AND USPS

Victor Suthammanont
Securities and Exchange Commission
200 Vesey Street, Suite 400
New York, NY 10281-1022
212-336-5674

Re: Inadvertent Disclosure of Privileged Communication

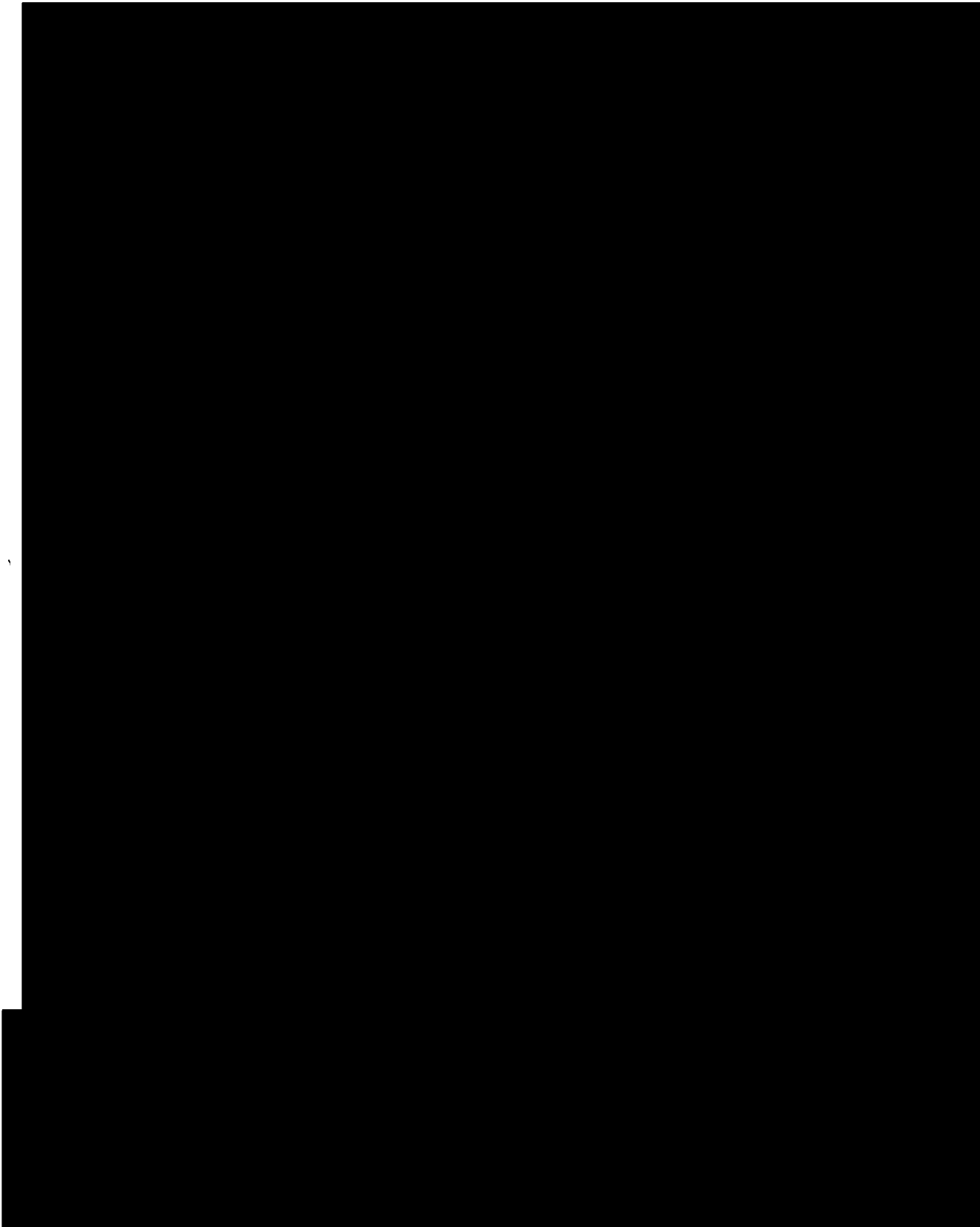
Dear Mr. Suthammanont,

We represent RD Legal Capital, LLC (“RDLC”) in this matter. During the testimony of Roni Dersovitz on January 29, 2016, we became aware that a confidential valuation report prepared by Pluris Valuation Advisors LLC (“Pluris”) and labeled by the Staff as Exhibit 31 (“Valuation Report”) and a confidential email containing attorney-client communications related to the Valuation Report labeled by the Staff as Exhibit 30 (“the Email”) had been inadvertently produced by Pluris in response to a subpoena from the Staff. We immediately asserted privilege over these documents and advised the Staff that Mr. Dersovitz would not answer any questions about the Valuation Report or the Email at that time. The Staff agreed to withdraw Exhibits 30 and 31 at that time pending receipt of this letter.

In conversations with the Staff after the testimony of Mr. Dersovitz, the Staff indicated that RDLC had produced six versions of the Valuation Report in its voluntary production on November 4, 2015.

The Valuation Report and the Email are protected by the attorney-client privilege and should not have been produced in this matter. We request the immediate return, sequester or destruction of any versions of the Valuation Report and the Email the SEC has received or will receive during the course of its investigation. We have identified seven versions of the Valuation Report that were inadvertently produced by RDLC. Six were produced on November 4, 2015:

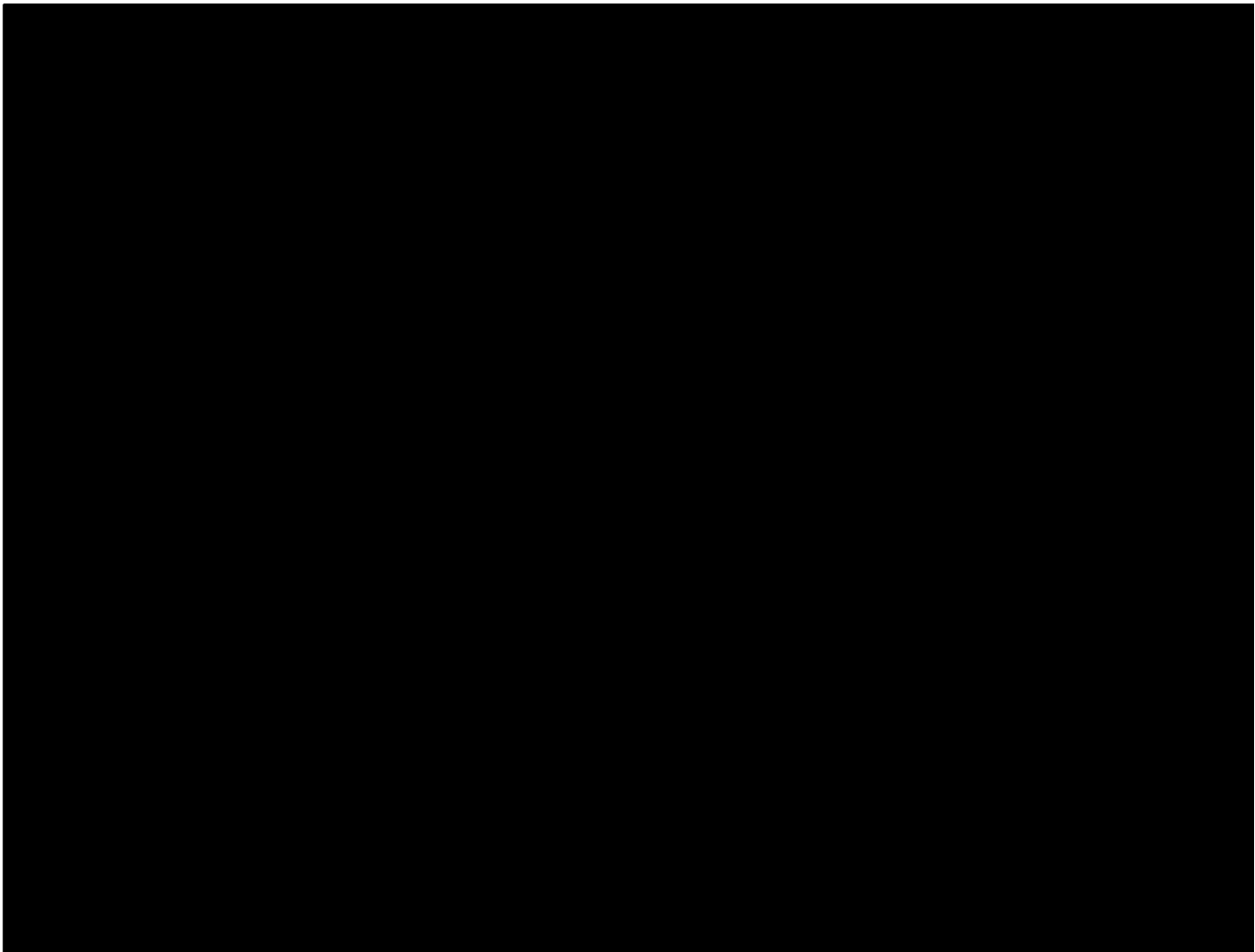
- RDLC-SEC-48533 through RDLC-SEC-48576
- RDLC-SEC-62900 through RDLC-SEC-62943



**CONFIDENTIAL TREATMENT REQUESTED BY
RD LEGAL CAPITAL, LLC UNDER 17 C.F.R. § 200.83**



**CONFIDENTIAL TREATMENT REQUESTED BY
RD LEGAL CAPITAL, LLC UNDER 17 C.F.R. § 200.83**



**CONFIDENTIAL TREATMENT REQUESTED BY
RD LEGAL CAPITAL, LLC UNDER 17 C.F.R. § 200.83**

Exhibit G

From: [Wolfe, Stephanie](#)
To: [Tenreiro, Jorge](#); [Suthammanont, Victor](#)
Cc: [Moulthrop, Samuel](#); [O'Neill, Ryan](#)
Subject: In re RD Legal Capital, LLC (NY-9287)
Date: Wednesday, February 10, 2016 5:10:23 PM
Attachments: [image003.png](#)
[RIKER_DOCS2-#4697994-v1-Potentially Privileged Documents.xlsx](#)

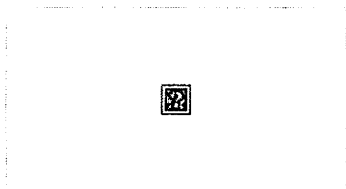
Dear Jorge and Victor:

As a follow up to our conversation yesterday, attached is a list of documents produced by Pluris that may be subject to a claim of privilege by RD Legal or Mr. Dersovitz.

As mentioned in each of the cover letters submitted with Pluris's productions, to the extent any of the listed documents are protected by the attorney-client privilege, work product doctrine, or any other privilege, such production is inadvertent and not intended to constitute a waiver. Consistent with our conversation yesterday, we would ask that SEC sequester these documents and not use the information until any claim by RD Legal or Mr. Dersovitz is resolved.

Thank you for your continuing courtesies.

Stephanie



Stephanie R. Wolfe | Counsel
Riker Danzig Scherer Hyland & Perretti LLP
Headquarters Plaza | One Speedwell Avenue | Morristown, NJ 07962-1981
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PVA000461 7	PVA000462 0			Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Espen Robak <erobak@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Ciavarella, Angelo <ACiavarella@RoadSmith.com>	RE: RDLC and RDLC Estate Planning Valuation	2/18/2013	
PVA000462 1	PVA000462 4			'Espen Robak' <erobak@pluris.com>	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Ciavarella, Angelo <ACiavarella@RoadSmith.com>	RE: RDLC and RDLC Estate Planning Valuation	2/18/2013	
PVA000463 6	PVA000463 6	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>; Espen Robak <erobak@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71cc88a04615bbc36ab6ce41109e@med02.msrv.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/21/2013	
PVA000463 7	PVA000464 2	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>; Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/21/2013	2/21/2013 Kyle Vataha
PVA000464 5	PVA000464 5	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>; Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/21/2013	
PVA000464 6	PVA000465 1	PVA0004645	PVA0004653	Roni Dersovitz <rdersovitz@legalfunding.com>; Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/21/2013	2/21/2013 Kyle Vataha
PVA000465 2	PVA000465 2	PVA0004645	PVA0004653	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/26/2013	
PVA000466 1	PVA000467 1	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/26/2013	
PVA000468 1	PVA000468 1	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/26/2013	
PVA000469 1	PVA000469 1	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/26/2013	
PVA000470 1	PVA000471 1	PVA0004636	PVA0004644	Roni Dersovitz <rdersovitz@legalfunding.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/26/2013	
PVA000471 2	PVA000471 2	PVA0004719	PVA0004728	Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Espen Robak <erobak@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>	RE: RD Financials	2/26/2013	
PVA000471 3	PVA000471 3	PVA0004719	PVA0004728	Kyle Vataha <kvataha@pluris.com>; Espen Robak <erobak@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/26/2013	
PVA000472 4	PVA000472 4	PVA0004719	PVA0004728	Kyle Vataha <kvataha@pluris.com>; Espen Robak <erobak@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/26/2013	2/25/2013 Kyle Vataha
PVA000472 5	PVA000473 5	PVA0004719	PVA0004728	Kyle Vataha <kvataha@pluris.com>; Espen Robak <erobak@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>; Amy Hirsch <ahirsch@psahedge.com>	RE: RD Financials	2/26/2013	
PVA000473 6	PVA000474 6	PVA0004744	PVA0004749	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com>	RE: RD Financials	2/27/2013	
PVA000474 7	PVA000474 7	PVA0004744	PVA0004749	Amy Hirsch <ahirsch@psahedge.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>; Katarina Markovic (Legal/Capital) <KMarkovic@rdlegalcapital.com>; Joseph Genovesi <jgenovesi@legalfunding.com>; Espen Robak <erobak@pluris.com>	FW: <no subject>	2/28/2013	
PVA000474 8	PVA000474 8	PVA0004744	PVA0004749	Amy Hirsch <ahirsch@psahedge.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>; Katarina Markovic (Legal/Capital) <KMarkovic@rdlegalcapital.com>; Joseph Genovesi <jgenovesi@legalfunding.com>; Espen Robak <erobak@pluris.com>	FW: <no subject>	2/28/2013	2/28/2013
PVA000474 9	PVA000474 9	PVA0004744	PVA0004749	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	3/11/2013	
PVA000488 1	PVA000489 1	PVA000489	PVA000490	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	3/11/2013	
PVA000490 2	PVA000490 2	PVA000490	PVA000497	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	3/11/2013	
PVA000496 3	PVA000497 3	PVA000497	PVA000497	Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	FW: RDLC and RDLC Estate Planning	3/11/2013	
PVA000497 4	PVA000497 4	PVA000497	PVA000497	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz <rdersovitz@legalfunding.com>; Ciavarella, Angelo <ACiavarella@RoadSmith.com>	RE: RDLC and RDLC Estate Planning Valuation	3/14/2013	
PVA000497 5	PVA000498 5	PVA000498	PVA000498	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Roni Dersovitz <rdersovitz@legalfunding.com>; Ciavarella, Angelo <ACiavarella@RoadSmith.com>	RE: RDLC and RDLC Estate Planning Valuation	3/14/2013	
PVA000500 6	PVA000500 6	PVA0005003	PVA0005011	'Kyle Vataha' <kvataha@pluris.com>; Espen Robak <erobak@pluris.com>	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Roni Dersovitz <rdersovitz@legalfunding.com>; Ciavarella, Angelo <ACiavarella@RoadSmith.com>	RE: RDLC and RDLC Estate Planning Valuation	3/14/2013	
PVA000500 7	PVA000500 7	PVA0005003	PVA0005011	Romi Gussin <rgussin@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71cc88a04615bbc36ab6ce41109e@med02.msrv.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal Retainer Letter and Chuck	3/15/2013	
PVA000500 8	PVA000500 8	PVA0005003	PVA0005011	Romi Gussin <rgussin@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal Retainer Letter and Chuck	3/15/2013	3/15/2013
PVA000501 9	PVA000501 9	PVA0005003	PVA0005011	Romi Gussin <rgussin@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal Retainer Letter and Chuck	3/15/2013	3/15/2013
PVA000501 10	PVA000501 10	PVA0005003	PVA0005011	Romi Gussin <rgussin@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal Retainer Letter and Chuck	3/15/2013	3/15/2013
PVA000658 1	PVA000658 1	PVA0006585	PVA0006617	Espen Robak <erobak@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71cc88a04615bbc36ab6ce41109e@med02.msrv.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Eric Liu <eliu@pluris.com>; Jennifer Sepulveda <jsepulveda@pluris.com>	RE: RD Legal	6/18/2013	
PVA000658 2	PVA000658 2	PVA0006585	PVA0006617	Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Eric Liu <eliu@pluris.com>; Jennifer Sepulveda <jsepulveda@pluris.com>	RE: RD Legal	6/18/2013	
PVA000658 3	PVA000661 3	PVA0006585	PVA0006617	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71cc88a04615bbc36ab6ce41109e@med02.msrv.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal	6/20/2013	6/18/2013 kvataha
PVA000663 4	PVA000663 4	PVA0006631	PVA0006677	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71cc88a04615bbc36ab6ce41109e@med02.msrv.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	RD Legal	6/20/2013	6/20/2013 kvataha

PVA000667 8	PVA000667 8	PVA0006678	PVA0006747	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Microsoft Exchange <MicrosoftExchange329c71cc88a04615bbc36ab6cc 41109a@jme02.msrvr.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz (ndersovitz@legalfunding.com); Ciavarella, Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com) (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/21/2013
PVA000667 9	PVA000668 3	PVA0006678	PVA0006747	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz (ndersovitz@legalfunding.com); Ciavarella, Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com) (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/21/2013
PVA000668 PVA000672 PVA000674 PVA000674 8	PVA000672 PVA000674 PVA000674 8	PVA0006678 PVA0006678 PVA0006748	PVA0006747 PVA0006747 PVA0006817	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz (ndersovitz@legalfunding.com); Ciavarella, Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com) (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/21/2013 kvataha 6/21/2013 dhogancamp
PVA000674 9	PVA000675 3	PVA0006748	PVA0006817	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Roni Dersovitz (ndersovitz@legalfunding.com); Ciavarella, Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com) (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/21/2013
PVA000675 PVA000679 PVA000682 4	PVA000679 PVA000681 PVA000682 9	PVA0006748 PVA0006748	PVA0006817 PVA0006817	Roni Dersovitz <ndersovitz@legalfunding.com>; Gilberti Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000683 0	PVA000683 5			Roni Dersovitz <ndersovitz@legalfunding.com>; Gilberti Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000683 PVA000684 3	PVA000684 PVA000684 3	PVA0006843	PVA0006913	Kyle Vataha <kvataha@pluris.com> Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; 'Roni Dersovitz' <ndersovitz@legalfunding.com>	Espen Robak <erobak@pluris.com> Microsoft Exchange <MicrosoftExchange329c71cc88a04615bbc36ab6cc 41109a@jme02.msrvr.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	Re: RDLC and RDLC Estate Planning Valuation RE: RDLC and RDLC Estate Planning Valuation	6/23/2013 6/23/2013
PVA000684 4	PVA000684 9	PVA0006843	PVA0006913	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; 'Roni Dersovitz' <ndersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000685 PVA000689 PVA000691 4	PVA000689 PVA000691 PVA000691 4	PVA0006843 PVA0006843 PVA0006914	PVA0006913 PVA0006913 PVA0006984	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; 'Roni Dersovitz' <ndersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000691 5	PVA000692 0	PVA0006914	PVA0006984	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; 'Roni Dersovitz' <ndersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000692 PVA000696 PVA000698 PVA000699 PVA000699 PVA000700 PVA000700 4	PVA000696 PVA000698 PVA000699 PVA000699 PVA000700 PVA000700 9	PVA0006914 PVA0006914	PVA0006984 PVA0006984	Espen Robak <erobak@pluris.com> Kyle Vataha <kvataha@pluris.com> Espen Robak <erobak@pluris.com> Espen Robak <erobak@pluris.com> 'Roni Dersovitz' <ndersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>	Kyle Vataha <kvataha@pluris.com> Espen Robak <erobak@pluris.com> Kyle Vataha <kvataha@pluris.com> Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	RE: RDLC and RDLC Estate Planning Valuation Re: RDLC and RDLC Estate Planning Valuation FW: RDLC and RDLC Estate Planning RE: RDLC and RDLC Estate Planning Valuation	6/23/2013 6/23/2013 6/23/2013 6/23/2013
PVA000701 0	PVA000701 5			Kyle Vataha <kvataha@pluris.com>; Gilberti Lawrence F. <LGilberti@RoadSmith.com>	Roni Dersovitz <ndersovitz@legalfunding.com>	Ciavarella Angelo <ACiavarella@RoadSmith.com>; Leo Zatta (lzatta@legalfunding.com); Espen Robak <erobak@pluris.com>	Re: RDLC and RDLC Estate Planning Valuation	6/23/2013
PVA000723 PVA000727 PVA000745 9	PVA000723 PVA000727 PVA000745 9	PVA0007459	PVA0007548	Eric Liu <eliu@pluris.com> Kyle Vataha <kvataha@pluris.com> Roni Dersovitz <ndersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com> Eric Liu <eliu@pluris.com> Microsoft Exchange <MicrosoftExchange329c71cc88a04615bbc36ab6cc 41109a@jme02.msrvr.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com> Espen Robak <erobak@pluris.com> jundtler@roadsmith.com; Leo Zatta (lzatta@legalfunding.com); Eric Liu <eliu@pluris.com>; Espen Robak <erobak@pluris.com>	FW: <no subject> RE: <no subject> RE: <no subject>	7/14/2013 7/15/2013 7/31/2013
PVA000746 0	PVA000746 4	PVA0007459	PVA0007548	Roni Dersovitz <ndersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	jundtler@roadsmith.com; Leo Zatta (lzatta@legalfunding.com); Eric Liu <eliu@pluris.com>; Espen Robak <erobak@pluris.com>	RE: <no subject>	7/31/2013
PVA000746 PVA000752	PVA000752 PVA000754	PVA0007459 PVA0007459	PVA0007548 PVA0007548					7/31/2013 dhogancamp 7/31/2013 dhogancamp

PVA001827	PVA001835	PVA0017715	PVA0018558					
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PVA001836	PVA001836	PVA0017715	PVA0018558					
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PVA001845	PVA001845	PVA0017715	PVA0018558					
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PVA003056	PVA003056	PVA0030566	PVA0030598	Espen Robak <erobak@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71ca88a04615bbc36ab6cc41109e@ms02.mlsrvr.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>	Eric Liu <eliu@pluris.com>; Jennifer Sepulveda <jsepulveda@pluris.com>	RE: RD Legal	6/18/2013
PVA003056	PVA003056	PVA0030566	PVA0030598	Espen Robak <erobak@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Eric Liu <eliu@pluris.com>; Jennifer Sepulveda <jsepulveda@pluris.com>	RE: RD Legal	6/18/2013
PVA003056	PVA003059	PVA0030566	PVA0030598	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71ca88a04615bbc36ab6cc41109e@ms02.mlsrvr.com> - on behalf of - Kyle Vataha <kvataha@pluris.com>		RD Legal	6/20/2013
PVA003061	PVA003061	PVA0030664	PVA0030664	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	Kyle Vataha <kvataha@pluris.com>		RD Legal	6/20/2013
PVA003061	PVA003061	PVA0030618	PVA0030664	Eric Liu <eliu@pluris.com>	Kyle Vataha <kvataha@pluris.com>	Espen Robak <erobak@pluris.com>	FW: <no subject>	7/14/2013
PVA003062	PVA003066	PVA0030618	PVA0030664	Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti Lawrence F. <LGilberti@RoalSmith.com>; Pamela Dersovitz <pdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Jacobs Michael A. <MJacobs@RoalSmith.com>; James Tandler <jtandler@roodsmith.com>; Poe Alexandra <APoe@RoalSmith.com>; Leo Zatta <lzatta@legalfunding.com>; Eric Liu <eliu@pluris.com>	RE: <no subject>	7/15/2013
PVA003081	PVA003081			Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti Lawrence F. <LGilberti@RoalSmith.com>; Pamela Dersovitz <pdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Jacobs Michael A. <MJacobs@RoalSmith.com>; James Tandler <jtandler@roodsmith.com>; Poe Alexandra <APoe@RoalSmith.com>; Leo Zatta <lzatta@legalfunding.com>; Eric Liu <eliu@pluris.com>	RE: <no subject>	7/15/2013
PVA003081	PVA003082			Gilberti, Lawrence F. <LGilberti@RoalSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Pamela Dersovitz <pdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Jacobs, Michael A. <MJacobs@RoalSmith.com>; James Tandler <jtandler@roodsmith.com>; Poe, Alexandra <APoe@RoalSmith.com>; Leo Zatta <lzatta@legalfunding.com>; Eric Liu <eliu@pluris.com>	RE: <no subject>	7/15/2013
PVA003082	PVA003082			Gilberti, Lawrence F. <LGilberti@RoalSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Pamela Dersovitz <pdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	Jacobs, Michael A. <MJacobs@RoalSmith.com>; James Tandler <jtandler@roodsmith.com>; Poe, Alexandra <APoe@RoalSmith.com>; Leo Zatta <lzatta@legalfunding.com>; Eric Liu <eliu@pluris.com>	RE: <no subject>	7/15/2013
PVA003082	PVA003082			Kyle Vataha <kvataha@pluris.com>	Eric Liu <eliu@pluris.com>	Espen Robak <erobak@pluris.com>	RE: <no subject>	7/15/2013

PVA003082 PVA003083 PVA003083 PVA003084 7	PVA003083 PVA003083 PVA003083 PVA003084 0	Kyle Vataha <kvataha@pluris.com> Eric Liu <eliu@pluris.com> Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Eric Liu <eliu@pluris.com> Kyle Vataha <kvataha@pluris.com> Roni Dersovitz <rdersovitz@legalfunding.com>	kvataha@pluris.com; Pamela Dersovitz <pdersovitz@legalfunding.com>; jandler@roadsmith.com; Leo Zatta <lzatta@legalfunding.com>;	RE: <no subject> FW: <no subject> Re: <no subject>	7/16/2013 7/16/2013 7/16/2013	
PVA003084 1	PVA003084 4	kvataha@pluris.com; rdersovitz@legalfunding.com;	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	jandler@roadsmith.com;	Re: <no subject>	7/16/2013	
PVA003084 5	PVA003084 8	kvataha@pluris.com; rdersovitz@legalfunding.com;	Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	lvataha@legalfunding.com;	Re: <no subject>	7/16/2013	
PVA003084 9	PVA003084 9	PVA0030849 PVA0030918	Eric Liu <eliu@pluris.com>	rdersovitz@legalfunding.com;	RE: <no subject>	7/16/2013	
PVA003085 PVA003085 PVA003089 PVA003091 PVA003091 PVA003109 0	PVA003085 PVA003089 PVA003091 PVA003092 PVA003109 0	PVA0030849 PVA0030918 PVA0030918 PVA0030918 PVA0031090 PVA0031179	Eric Liu <eliu@pluris.com> Kyle Vataha <kvataha@pluris.com> Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	rdersovitz@legalfunding.com; Leo Zatta <lzatta@legalfunding.com>; Eric Liu <eliu@pluris.com>; Espen Robak <erobak@pluris.com>	RE: <no subject> RE: <no subject>	7/16/2013 7/31/2013	6/21/2013 kvataha 6/21/2013 dhogancamp 7/21/2011 dhogancamp
PVA003109 1	PVA003109 5	PVA0031090 PVA0031179	Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	RE: <no subject>	7/31/2013	
PVA003109 PVA003116 PVA003118 0	PVA003115 PVA003117 PVA003118 0	PVA0031090 PVA0031179 PVA0031180 PVA0031269	Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	RE: <no subject>	7/31/2013	7/31/2013 dhogancamp 7/31/2013 dhogancamp
PVA003118 1	PVA003118 5	PVA0031180 PVA0031269	Roni Dersovitz <rdersovitz@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com>	RE: <no subject>	7/31/2013	
PVA003118 PVA003125 PVA003161 9	PVA003124 PVA003126 PVA003161 9	PVA0031180 PVA0031269 PVA0031688 PVA0031688	Eric Liu <eliu@pluris.com>	Microsoft Exchange <MicrosoftExchange329e71ec88a04615bbc36ab6ce41109a@mes02.mlsrvr.com> - on behalf of - Espen Robak <erobak@pluris.com>	FW: <no subject>	9/6/2013	7/31/2013 dhogancamp 7/31/2013 dhogancamp
PVA003162 PVA003162 PVA003182 PVA003187 PVA003187 PVA003188 PVA003188 PVA003211 PVA003211 5	PVA003162 PVA003168 PVA003183 PVA003187 PVA003187 PVA003188 PVA003190 PVA003190 PVA003211 PVA003212 5	PVA0031619 PVA0031688 PVA0031903 PVA0031903 PVA0031903 PVA0031903 PVA0031903 PVA003211 PVA003212 5	Eric Liu <eliu@pluris.com> Kyle Vataha <kvataha@pluris.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com> Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Kyle Vataha <kvataha@pluris.com> Roni Dersovitz <rdersovitz@legalcapital.com> Roni Dersovitz <RDersovitz@rdlegalcapital.com>	FW: RDLF and RDLC Estate Planning FW: Peterson FW: Peterson	9/12/2013 9/16/2013 9/16/2013	
PVA003212 6	PVA003213 6	PVA0032136	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Leo Zatta <lzatta@legalfunding.com>	RE: RDLF and RDLC Estate Planning Valuation	9/17/2013	
PVA003213 7	PVA003214 7	PVA0032147	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	9/17/2013	
PVA003214 8	PVA003215 8	PVA0032158	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	9/17/2013	
PVA003532 8	PVA003533 9	PVA0035338	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	3/24/2014	
PVA003534 0	PVA003535 1	PVA0035350	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	3/24/2014	
PVA003535 2	PVA003536 3	PVA0035362	Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>; Roni Dersovitz <rdersovitz@legalfunding.com>	Kyle Vataha <kvataha@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	3/24/2014	
PVA003600 2	PVA003601 4	PVA0036012	Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RoadSmith.com>	Roni Dersovitz <rdersovitz@legalfunding.com>	Re: RDLF and RDLC Estate Planning Valuation	6/8/2014	
PVA003601 5	PVA003601 5	PVA0036015	Caryn Sherry <esherry@legalfunding.com>	Eric Liu <eliu@pluris.com>	Accepted: Conference call with Roni, Leo, Espen Robak, Lawrence Gilberti, Kyle Vataha, Eric Liu and Kevin McElroy Re: RDLF and RDLC Estate Planning Valuation	6/9/2014	

PVA003601 6	PVA003601 6	Leo Zatta <lzatta@legalfunding.com>; Leo Zatta <LZatta@rllegalscapital.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Espen Robak <erobak@pluris.com>; Gilberti, Lawrence F. <LGilberti@RootSmith.com>; Kyle Vataha <kvataha@pluris.com>; Eric Liu <eliu@pluris.com>; Kevin McElroy <kmcedroy@pluris.com>	Caryn Sherry <csherry@legalfunding.com>		Conference call with Roni, Leo, Espen Robak, Lawrence Gilberti, Kyle Vataha, Eric Liu and Kevin McElroy Re: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003601 7	PVA003603 0	Gilberti, Lawrence F. <LGilberti@RootSmith.com>; 'Caryn Sherry' <csherry@legalfunding.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>	Espen Robak <erobak@pluris.com>	Eric Liu <eliu@pluris.com>; Kevin McElroy <kmcedroy@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003603 1	PVA003604 4	Gilberti, Lawrence F. <LGilberti@RootSmith.com>; 'Caryn Sherry' <csherry@legalfunding.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>	Espen Robak <erobak@pluris.com>	Eric Liu <eliu@pluris.com>; Kevin McElroy <kmcedroy@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003604 5	PVA003605 8	'Caryn Sherry' <csherry@legalfunding.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>	Gilberti, Lawrence F. <LGilberti@RootSmith.com>	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003605 9	PVA003607 2	'Caryn Sherry' <csherry@legalfunding.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>	Gilberti, Lawrence F. <LGilberti@RootSmith.com>	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003607 3	PVA003608 6	'Caryn Sherry' <csherry@legalfunding.com>; Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>	Gilberti, Lawrence F. <LGilberti@RootSmith.com>	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA003608 7	PVA003609 9	Roni Dersovitz <rdersovitz@legalfunding.com>; Kyle Vataha <kvataha@pluris.com>; Leo Zatta <lzatta@legalfunding.com>; Gilberti, Lawrence F. <LGilberti@RootSmith.com>	Caryn Sherry <csherry@legalfunding.com>	Espen Robak <erobak@pluris.com>; Eric Liu <eliu@pluris.com>	RE: RDLF and RDLC Estate Planning Valuation	6/9/2014
PVA005277	PVA005278					

3/1/2012 kvataha