

EXHIBIT A

SCHEDULE OF DOCUMENTS TO BE PRODUCED BY RESPONDENTS:
Thomas Dittmer, Thomas Hackl, Mark Kavanagh, Dennis Klejna, Joseph Murphy, Victor Niederhoffer and Niederhoffer Investments Inc., William M. Sexton, Chris Sugrue, Philip Silverman, and David Weaver

DEFINITIONS

The terms used herein shall have the meanings ascribed to them in the definitions set forth below.

1. “BAWAG” means BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft, any of its subsidiaries (and any predecessors thereof) including but not limited to, BAWAG Overseas Inc. and Alinea Holding GmbH, directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.
2. “Bennett” means Phillip R. Bennett.
3. “Board of Directors” means Refco’s Board of Directors or Board of Managers and any of Refco’s Board of Directors’ or Board of Managers’ subcommittees.
4. The term “concerning” means relating to, referring to, describing, evidencing or constituting.
5. “Delta” means Delta Flyer Fund, LLP. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.
6. “Desana” means Desana Foundation, a Lichtenstein Stiftung (Lichtenstein Foundation), any of its subsidiaries, directors, officers, shareholders, employees, affiliates,

representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

7. “DF Capital” means DF Capital Inc., a corporation organized under the laws of Delaware, any of its subsidiaries, directors, officers, shareholders, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

8. The term “document” is intended to have the broadest possible meaning under Rule 34 of the Federal Rules of Civil Procedure and includes, without limitation, any writings, drawings, graphs, charts, photographs, phone records, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the respondent through detection devices into reasonably usable form, or other information, including originals, translations and drafts thereof and all copies bearing notations and marks not found on the original. The term “document” includes, without limitation, affidavits, analyses, appointment books, appraisals, articles from publications, audit and scope plans (whether in paper, database, electronic or other format(s)), audit workpapers (whether in paper, database, electronic or other format(s)), books, books of account, account statements, cables, calendars, charts, checks (cancelled or uncanceled), check stubs, confirmations, contracts, correspondence, credit card receipts, desk calendars, desk pads, diaries, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, invoices, journals, ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, partners’ and employees’ personnel files, partners’ and employees’ review check lists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies,

summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheets or things similar to any of the foregoing however denominated. The term “document” further includes email and electronic communication whether stored on a personal computer, network computer system, backup computer tape and/or disk, or by some other storage mechanism. The term “document” further means any document now or at any time in the possession, custody, or control of the entity to whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term “control” as used in the preceding sentence, a person is deemed to be in control of a document if the person has the right to secure the document or a copy thereof from another person having actual possession thereof, including, but not limited to, work product contracted by you from professional firms.

9. “Ingram Micro” means Ingram Micro Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

10. “Leveraged Recapitalization” means a series of transactions occurring in August 2004 in which Thomas H. Lee Partners, together with certain affiliates and co-investors, acquired approximately 57 percent of the equity interests in New Refco Group Ltd, LLC (“New Refco”) in a leveraged recapitalization and any transaction whether before or after August 2004 directly or indirectly connected to THL’s acquisition of the 57 percent stake in New Refco.

11. “Liberty Corner” means Liberty Corner Capital Strategies, LLC (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers,

employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

12. “Refco” means Refco, Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), including without limitation, Refco Group Ltd. LLC (“RGL”), New Refco and Refco Capital Markets Ltd. (“RCM”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

13. “RGHI” means Refco Group Holdings, Inc. directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on its behalf.

14. “Refco Securities” means any note, stock, treasury stock, debenture, evidence of indebtedness, collateral trust certificate, transferable share, voting trust certificate, or any other certificate of interest or participation (whether permanent, temporary or interim), or any warrant, option or right to subscribe to or purchase any of the foregoing concerning Refco.

15. “Thomas H. Lee Partners” means Thomas H. Lee Partners L.P., a partnership, its predecessors, all parents, subsidiaries, partners, principals, managers and employees and any successors in interest.

16. The words “you” or “your” means you and any or all past or present employees, partners, agents, representatives, officers, attorneys, or other persons or entities acting or purporting to act for or on your behalf.

17. The terms “all” and “each” shall be construed as “all and each.”

18. “Family” means your parents, children, spouse, former spouse, siblings and/or significant other(s), including domestic partners.

19. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

INSTRUCTIONS

A. The documents covered by this request include all documents in your possession, custody or control. Unless otherwise specified, each request herein seeks all documents generated or received by you during the period from January 1, 2000 through and including the date of production.

B. Each request for the production of documents shall be deemed to be continuing in nature. If at any time additional documents come into your possession, custody or control or are brought to your attention, prompt supplementation of your response to these requests is required.

C. You shall produce all documents in the manner in which they are maintained in the usual course of your business and/or you shall organize and label the documents to correspond with the categories in this request. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

D. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access

to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

E. Documents shall be produced in such fashion as to identify the department, branch or office in which they were located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian(s).

F. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

G. Documents attached to each other should not be separated.

H. Documents not otherwise responsive to this discovery request shall be produced if such documents mention, discuss, refer to, or explain the documents which are called for by this discovery request.

I. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

J. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by you or your directors, officers, agents,

employees, representatives, subsidiaries, managing agents, affiliates, accountants, investigators, or by your attorneys or their agents, employees, representatives or investigators.

K. If you object to any part of any request, you shall state fully in writing the nature of the objection. Notwithstanding any objections, you shall nonetheless comply fully with the other parts of the request to which you are not objecting.

L. Each document request shall be construed independently and not with reference to any other document request for the purpose of limitation.

O. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning Refco, RGHI, BAWAG, Bennett, Delta, Liberty Corner, DF Capital and/or Desana.

REQUEST NO. 2:

All employment contracts, and/or business agreements whether formal or informal, and documents concerning any compensation or payments of any kind, whether in cash, options, loans, Refco Securities or any other thing of value, received by you or any member of your Family, from Refco, RGHI, BAWAG, Delta, Liberty Corner, or Thomas H. Lee Partners, including documents sufficient to show the date and amount of each such item, from January 1, 1995.

REQUEST NO. 3:

All documents relating to your position of employment at Refco, RGHI, BAWAG, or any Refco subsidiary, from January 1, 1995.

REQUEST NO. 4:

All documents concerning ownership or financial interests in Refco, RGHI, Delta, BAWAG, Liberty Corner, PlusFunds or Thomas H. Lee Partners held directly or indirectly by you or any member of your Family, including Refco Securities, including documents sufficient to identify the ownership interests, the values thereof, the amounts invested, and anticipated and actual returns on the amounts invested, from January 1, 1995.

REQUEST NO. 5:

All documents concerning Refco's or RGHI's accounting policies, practices and procedures.

REQUEST NO. 6:

All documents concerning involvement in or oversight of Refco's accounting policies, practices and procedures by any member, past or present, of the management or Board of Directors of Refco or RGHI including but not limited to documents concerning the oversight of internal review of proposed transactions between Refco or RGHI, on the one hand, and Delta, BAWAG, Ingram Micro or Liberty Corner, on the other.

REQUEST NO. 7:

All documents concerning meetings of the management or Board of Directors of Refco or RGHI.

REQUEST NO. 8:

All documents concerning the Leveraged Recapitalization.

REQUEST NO. 9:

All documents concerning Refco's initial public offering on or about August 16, 2005, including documents related to the preparation and filing of documents or revised filings with the SEC related to Refco's initial public offering.

REQUEST NO. 10:

All documents concerning Refco's use of proceeds from the Leveraged Recapitalization and Refco's initial public offering, including but not limited to Refco's use of proceeds for a partial notes redemption, for payments of a management fee and/or dividend to Thomas H. Lee Partners, for shareholders' taxes, for dividends to shareholders in Refco's predecessor prior to the initial public offering, and for dividends to RGHI.

REQUEST NO. 11:

All documents concerning transactions, including but not limited to loans, transfers or investments, between Refco, or any Refco officer, manager or employee, past or present, on the one hand, and Desana, BAWAG, DF Capital, Ingram Micro, Liberty Corner, Delta, RGHI or any other entity controlled by any member, past or present, of Refco's management or Board of Directors, on the other, from January 1, 1995.

REQUEST NO. 12:

All documents concerning any communication, including but not limited to email or other electronic communication, relating to Bennett, Refco, RGHI, BAWAG, Delta, Ingram Micro, Liberty Corner, Thomas H. Lee Partners, and/or a past or present executive or board member of Refco, from January 1, 1995.

REQUEST NO. 13:

All documents concerning the financial statements of Refco, RGHI, Desana, DF Capital or BAWAG.

REQUEST NO. 14:

All documents concerning any restatement or planned restatement of the financial statements of Refco or RGHI.

REQUEST NO. 15:

All statements, transcripts of testimony, communications and documents you or members of your Family provided to the SEC, any Committee of Congress, any federal, state or other regulatory authority or agency, any grand jury or in any litigation or arbitration concerning Refco, RGHI, Ingram Micro, Liberty Corner, BAWAG, Delta, or Liberty Corner.

REQUEST NO. 16:

Document sufficient to identify any legal or equitable claims, including the nature and amount of all such claims, asserted against you or members of your Family concerning Refco.

REQUEST NO. 17:

All documents which refer, reflect or relate to communications by any person with any insurance carriers concerning Refco.

REQUEST NO. 18:

All documents concerning communications between you and any of Refco or RGHI's agents, managers or officers, including but not limited to in-house or outside counsel.

REQUEST NO. 19:

All documents concerning any and all additional events or circumstances that you reasonably believe contributed to the Refco's filing for bankruptcy protection.

REQUEST NO. 20:

All documents concerning any past (since January 1, 1995) or present board member or executive of Refco, including but not limited to Bennett, Gerald M. Sherer, Tone Grant, Robert Trosten, William Sexton and/or Santo Maggio.

REQUEST NO. 21:

All documents (since January 1, 1995) concerning PlusFunds Group, Inc., Betio Asset Investments Ltd., Chaco City Investments Ltd., Rabaul Holdings Ltd., Tecka Asset Holdings Ltd., Tuvalu Holding Company, Ltd., Catamarca Asset Series, I, Ltd., Liquid Opportunity, Liquid Opportunity- Plus Fund, Alpha Capital AG, Jonathan Knight and/or Suffolk LLC.

EXHIBIT B

SCHEDULE OF DOCUMENTS TO BE PRODUCED BY RESPONDENTS:
Stephen Grady, Frank Mutterer, Eric Lipoff, Micky Dhillon,
the Jasdeep Dhillon Trustee MSD Family Trust, Sean O'Shea, and Edward McElwreath

DEFINITIONS

The terms used herein shall have the meanings ascribed to them in the definitions set forth below.

1. “BAWAG” means BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft, any of its subsidiaries (and any predecessors thereof) including but not limited to, BAWAG Overseas Inc. and Alinea Holding GmbH, directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.
2. “Bennett” means Phillip R. Bennett.
3. “Board of Directors” means Refco’s Board of Directors or Board of Managers and any of Refco’s Board of Directors’ or Board of Managers’ subcommittees.
4. The term “concerning” means relating to, referring to, describing, evidencing or constituting.
5. “Delta” means Delta Flyer Fund, LLP. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.
6. “Desana” means Desana Foundation, a Lichtenstein Stiftung (Lichtenstein Foundation), any of its subsidiaries, directors, officers, shareholders, employees, affiliates,

representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

7. “DF Capital” means DF Capital Inc., a corporation organized under the laws of Delaware, any of its subsidiaries, directors, officers, shareholders, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

8. The term “document” is intended to have the broadest possible meaning under Rule 34 of the Federal Rules of Civil Procedure and includes, without limitation, any writings, drawings, graphs, charts, photographs, phone records, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the respondent through detection devices into reasonably usable form, or other information, including originals, translations and drafts thereof and all copies bearing notations and marks not found on the original. The term “document” includes, without limitation, affidavits, analyses, appointment books, appraisals, articles from publications, audit and scope plans (whether in paper, database, electronic or other format(s)), audit workpapers (whether in paper, database, electronic or other format(s)), books, books of account, account statements, cables, calendars, charts, checks (cancelled or uncanceled), check stubs, confirmations, contracts, correspondence, credit card receipts, desk calendars, desk pads, diaries, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, invoices, journals, ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, partners’ and employees’ personnel files, partners’ and employees’ review check lists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies,

summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheets or things similar to any of the foregoing however denominated. The term “document” further includes email and electronic communication whether stored on a personal computer, network computer system, backup computer tape and/or disk, or by some other storage mechanism. The term “document” further means any document now or at any time in the possession, custody, or control of the entity to whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term “control” as used in the preceding sentence, a person is deemed to be in control of a document if the person has the right to secure the document or a copy thereof from another person having actual possession thereof, including, but not limited to, work product contracted by you from professional firms.

9. “Leveraged Recapitalization” means a series of transactions occurring in August 2004 in which Thomas H. Lee Partners, together with certain affiliates and co-investors, acquired approximately 57 percent of the equity interests in New Refco Group Ltd, LLC (“New Refco”) in a leveraged recapitalization and any transaction whether before or after August 2004 directly or indirectly connected to THL’s acquisition of the 57 percent stake in New Refco.

10. “Liberty Corner” means Liberty Corner Capital Strategies, LLC (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

11. “Refco” means Refco, Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), including without limitation, Refco Group Ltd. LLC (“RGL”), New Refco and Refco Capital Markets Ltd. (“RCM”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

12. “RGHI” means Refco Group Holdings, Inc. directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on its behalf.

13. “Refco Securities” means any note, stock, treasury stock, debenture, evidence of indebtedness, collateral trust certificate, transferable share, voting trust certificate, or any other certificate of interest or participation (whether permanent, temporary or interim), or any warrant, option or right to subscribe to or purchase any of the foregoing concerning Refco.

14. “Thomas H. Lee Partners” means Thomas H. Lee Partners L.P., a partnership, its predecessors, all parents, subsidiaries, partners, principals, managers and employees and any successors in interest.

15. The words “you” or “your” means you and any or all past or present employees, partners, agents, representatives, officers, attorneys, or other persons or entities acting or purporting to act for or on your behalf.

16. The terms “all” and “each” shall be construed as “all and each.”

17. “Family” means your parents, children, spouse, former spouse, siblings and/or significant other(s), including domestic partners.

18. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

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D. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

E. Documents shall be produced in such fashion as to identify the department, branch or office in which they were located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian(s).

F. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

G. Documents attached to each other should not be separated.

H. Documents not otherwise responsive to this discovery request shall be produced if such documents mention, discuss, refer to, or explain the documents which are called for by this discovery request.

I. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

J. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, accountants, investigators, or by your attorneys or their agents, employees, representatives or investigators.

K. If you object to any part of any request, you shall state fully in writing the nature of the objection. Notwithstanding any objections, you shall nonetheless comply fully with the other parts of the request to which you are not objecting.

L. Each document request shall be construed independently and not with reference to any other document request for the purpose of limitation.

O. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning Refco, RGHI, BAWAG, Bennett, DF Capital or Desana.

REQUEST NO. 2:

All employment contracts, and/or business agreements, including but not limited to profit sharing agreements, whether formal or informal between yourself on one hand, and Refco, RGHI, BAWAG, Bennett, DF Capital or Desana on the other.

REQUEST NO. 3:

All documents concerning any compensation, payment or transfer of funds of any kind, whether in cash, options, loans, Refco securities or any other thing of value (each a “Payment”), received by you or any member of your Family, from Refco, RGHI, BAWAG, Bennett, or Thomas H. Lee Partners, including documents sufficient to show the date and amount of each such Payment, any subsequent transfer of each Payment, and the current location of each Payment.

REQUEST NO. 4:

All documents relating to your position of employment at Refco or RGHI or your business agreement with Refco or RGHI.

REQUEST NO. 5:

All documents directly or indirectly referring to or relating to the nature of your relationship with Refco, RGHI, Bennett, DF Capital, Desana or a Refco executive or board member.

REQUEST NO. 6:

All documents concerning ownership or financial interests in Refco, RGHI, DF Capital, Desana or Thomas H. Lee Partners held directly or indirectly by you or any member of your Family, including Refco securities, including documents sufficient to identify the ownership interests, the values thereof, the amounts invested, and anticipated and actual returns on the amounts invested.

REQUEST NO. 7:

All correspondence between you and Bennett or between you and any other Refco executive or board member.

REQUEST NO. 8:

All documents concerning the Leveraged Recapitalization.

REQUEST NO. 9:

All documents concerning Refco's initial public offering on or about August 16, 2005.

REQUEST NO. 10:

All documents concerning transactions, including but not limited to loans, transfers or investments, between yourself or any member of your Family, on one hand and Refco, RGHI or any other entity controlled by any member, past or present, of Refco's management or Board of Directors, on the other, from January 1, 1995 until the present.

REQUEST NO. 11:

All documents concerning transactions, including but not limited to loans, transfers or investments, between Refco, RGHI, Bennett, DF Capital, Desana or Thomas H. Lee Partners, on the one hand, and yourself or any company in which you hold an executive position or serve as a board member, on the other hand.

REQUEST NO. 12:

All documents concerning any communication (including but not limited to email or other electronic communication) with or relating to Refco, RGHI, BAWAG, Thomas H. Lee Partners, or a past or present executive or board member of Refco (from 1995 until the present).

REQUEST NO. 13:

All statements, transcripts of testimony, communications and documents you or members of your Family provided to the SEC, any Committee of Congress, any federal, state or other regulatory authority or agency, any grand jury or in any litigation or arbitration concerning Refco, RGHI or Bennett.

REQUEST NO. 14:

Document sufficient to identify any legal or equitable claims, including the nature and amount of all such claims, asserted against you or members of your Family concerning Refco.

REQUEST NO. 15:

All documents relating to any claims asserted by you against Refco.

REQUEST NO. 16:

All documents which refer, reflect or relate to communications by any person with any insurance carriers concerning Refco.

REQUEST NO. 17:

All documents concerning communications between you and any of Refco, or RGHI's agents, managers, or officers, including but not limited to in-house or outside counsel.

REQUEST NO. 18:

All documents concerning any and all additional events or circumstances that you reasonably believe contributed to the Refco's filing for bankruptcy protection.

REQUEST NO. 19:

All documents concerning any past (since January 1, 1995) or present board member or executive of Refco, including but not limited to Bennett, Gerald M. Sherer, Tone Grant, Robert Trosten, William Sexton and/or Santo Maggio.

REQUEST NO. 20:

All documents concerning Delta, Liberty Corner, PlusFunds Group, Inc., Betio Asset Investments Ltd., Chaco City Investments Ltd., Rabaul Holdings Ltd., Tecka Asset Holdings Ltd., Tuvalu Holding Company, Ltd., Catamarca Asset Series, I, Ltd., Liquid Opportunity, Liquid Opportunity- Plus Fund, Alpha Capital AG, Jonathan Knight and/or Chris Sugrue.

SCHEDULE OF DOCUMENTS TO BE PRODUCED BY:
Delta Flyer Fund LLC, Eric Flanagan and Ingram Micro Inc.

DEFINITIONS

The terms used herein shall have the meanings ascribed to them in the definitions set forth below.

1. “BAWAG” means BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft, any of its subsidiaries (and any predecessors thereof) including but not limited to, BAWAG Overseas Inc. and Alinea Holding GmbH, directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.
2. “Bennett” means Phillip R. Bennett.
3. “Board of Directors” means Refco’s Board of Directors or Board of Managers and any of Refco’s Board of Directors’ or Board of Managers’ subcommittees.
4. The term “concerning” means relating to, referring to, describing, evidencing or constituting.
5. “Delta” means Delta Flyer Fund, LLP. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.
6. “Desana” means Desana Foundation, a Lichtenstein Stiftung (Lichtenstein Foundation), any of its subsidiaries, directors, officers, shareholders, employees, affiliates,

representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

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8. The term “document” is intended to have the broadest possible meaning under Rule 34 of the Federal Rules of Civil Procedure and includes, without limitation, any writings, drawings, graphs, charts, photographs, phone records, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the respondent through detection devices into reasonably usable form, or other information, including originals, translations and drafts thereof and all copies bearing notations and marks not found on the original. The term “document” includes, without limitation, affidavits, analyses, appointment books, appraisals, articles from publications, audit and scope plans (whether in paper, database, electronic or other format(s)), audit workpapers (whether in paper, database, electronic or other format(s)), books, books of account, account statements, cables, calendars, charts, checks (cancelled or uncanceled), check stubs, confirmations, contracts, correspondence, credit card receipts, desk calendars, desk pads, diaries, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, invoices, journals, ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, partners’ and employees’ personnel files, partners’ and employees’ review check lists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies,

summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheets or things similar to any of the foregoing however denominated. The term “document” further includes email and electronic communication whether stored on a personal computer, network computer system, backup computer tape and/or disk, or by some other storage mechanism. The term “document” further means any document now or at any time in the possession, custody, or control of the entity to whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term “control” as used in the preceding sentence, a person is deemed to be in control of a document if the person has the right to secure the document or a copy thereof from another person having actual possession thereof, including, but not limited to, work product contracted by you from professional firms.

9. “Leveraged Recapitalization” means a series of transactions occurring in August 2004 in which Thomas H. Lee Partners, together with certain affiliates and co-investors, acquired approximately 57 percent of the equity interests in New Refco group Ltd, LLC (“New Refco”) in a leveraged recapitalization and any transaction whether before or after August 2004 directly or indirectly connected to THL’s acquisition of the 57 percent stake in New Refco.

10. “Ingram Mirco” means Ingram Micro Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

11. “Liberty Corner” means Liberty Corner Capital Strategies, LLC (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers,

employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

12. “Refco” means Refco, Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), including without limitation, Refco Group Ltd. LLC (“RGL”), New Refco and Refco Capital Markets Ltd. (“RCM”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

13. “RGHI” means Refco Group Holdings, Inc. directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on its behalf.

14. “Refco Securities” means any note, stock, treasury stock, debenture, evidence of indebtedness, collateral trust certificate, transferable share, voting trust certificate, or any other certificate of interest or participation (whether permanent, temporary or interim), or any warrant, option or right to subscribe to or purchase any of the foregoing concerning Refco.

15. “Thomas H. Lee Partners” means Thomas H. Lee Partners L.P., a partnership, its predecessors, all parents, subsidiaries, partners, principals, managers and employees and any successors in interest.

16. The words “you” or “your” means you and any or all past or present employees, partners, agents, representatives, officers, attorneys, or other persons or entities acting or purporting to act for or on your behalf.

17. The terms “all” and “each” shall be construed as “all and each.”

18. “Family” means your parents, children, spouse, former spouse, siblings and/or significant other(s), including domestic partners.

19. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

INSTRUCTIONS

A. The documents covered by this request include all documents in your possession, custody or control. Unless otherwise specified, each request herein seeks all documents generated or received by you during the period from January 1, 2000 through and including the date of production.

B. Each request for the production of documents shall be deemed to be continuing in nature. If at any time additional documents come into your possession, custody or control or are brought to your attention, prompt supplementation of your response to these requests is required.

C. You shall produce all documents in the manner in which they are maintained in the usual course of your business and/or you shall organize and label the documents to correspond with the categories in this request. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

D. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access

to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

E. Documents shall be produced in such fashion as to identify the department, branch or office in which they were located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian(s).

F. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

G. Documents attached to each other should not be separated.

H. Documents not otherwise responsive to this discovery request shall be produced if such documents mention, discuss, refer to, or explain the documents which are called for by this discovery request.

I. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

J. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by you or your directors, officers, agents,

employees, representatives, subsidiaries, managing agents, affiliates, accountants, investigators, or by your attorneys or their agents, employees, representatives or investigators.

K. If you object to any part of any request, you shall state fully in writing the nature of the objection. Notwithstanding any objections, you shall nonetheless comply fully with the other parts of the request to which you are not objecting.

L. Each document request shall be construed independently and not with reference to any other document request for the purpose of limitation.

O. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning Refco, BAWAG, DF Capital, Desana, Thomas H. Lee Partners and/or RGHI.

REQUEST NO. 2:

All documents concerning any compensation or payments of any kind, whether in cash, option, loans, Refco securities or any other thing of value, you received from Refco or RGHI, including documents sufficient to show the date and amount of such item.

REQUEST NO. 3:

All documents concerning ownership or financial interests in Refco, BAWAG, Thomas H. Lee Partners or RGHI held directly or indirectly by you, including any Refco Securities, including documents sufficient to identify the ownership interests, the value thereof, the amounts invested, and anticipated and actual returns on the amounts invested.

REQUEST NO. 4:

All documents concerning the Leveraged Recapitalization.

REQUEST NO. 5:

All documents concerning Refco's initial public offering on or about August 16, 2005.

REQUEST NO. 6:

All documents concerning any communication (including but not limited to email and other electronic communication) relating to or with Refco, RGHI or Thomas H. Lee Partners.

REQUEST NO. 7:

All documents concerning transactions, including but not limited to loans, transfers or investments, between you, on the one hand, and Refco, RGHI or any other entity controlled by any member, past or present, of Refco's management or Board of Directors, or any Refco officer, director, employee, on the other.

REQUEST NO. 8:

All documents concerning any agreements, whether formal or informal, between you, on one hand and Refco, BAWAG, or RGHI, or any Refco officer, director or employee, on the other.

REQUEST NO. 9:

All statements, transcripts of testimony, communications and documents you provided to the SEC, any Committee of Congress, any federal, state or other regulatory authority or agency, any grand jury or in any litigation or arbitration concerning Refco or RGHI.

REQUEST NO. 10:

Documents sufficient to identify any legal or equitable claims, including the nature and amount of all such claims, asserted against you concerning Refco.

REQUEST NO. 11:

All documents which refer, reflect or relate to communications by any person with any insurance carriers concerning Refco.

REQUEST NO. 12:

All documents concerning any and all additional events or circumstances that you reasonably believe contributed to Refco's filing for bankruptcy protection.

REQUEST NO. 13:

All documents concerning any past (since January 1, 1995) or present board member or executive of Refco, including but not limited to Bennett, Gerald M. Sherer, Tone Grant, Robert Trosten, William Sexton and/or Santo Maggio.

REQUEST NO. 14:

All documents concerning, Liberty Corner, PlusFunds Group, Inc., Betio Asset Investments Ltd., Chaco City Investments Ltd., Rabaul Holdings Ltd., Tecka Asset Holdings Ltd., Tuvalu Holding Company, Ltd., Catamarca Asset Series, I, Ltd., Liquid Opportunity, Liquid Opportunity-Plus Fund, Alpha Capital AG, Jonathan Knight, Mark Kavanagh, Suffolk LLC and/or Chris Sugrue.

EXHIBIT D

SCHEDULE OF DOCUMENTS TO BE PRODUCED BY:
Arthur Andersen, Ernst & Young LLP, Levine & Jacobs, and
PricewaterhouseCoopers, LLP

DEFINITIONS

The terms used herein shall have the meanings ascribed to them in the definitions set forth below.

1. “BAWAG” means BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft, any of its subsidiaries (and any predecessors thereof) including but not limited to, BAWAG Overseas Inc. and Alinea Holding GmbH, directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.
2. “Bennett” means Phillip R. Bennett.
3. “Board of Directors” means Refco’s Board of Directors or Board of Managers and any of Refco’s Board of Directors’ or Board of Managers’ subcommittees.
4. The term “concerning” means relating to, referring to, describing, evidencing or constituting.
5. “Delta” means Delta Flyer Fund, LLP. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.
6. “Desana” means Desana Foundation, a Lichtenstein Stiftung (Lichtenstein Foundation), any of its subsidiaries, directors, officers, shareholders, employees, affiliates,

representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

7. “DF Capital” means DF Capital Inc., a corporation organized under the laws of Delaware, any of its subsidiaries, directors, officers, shareholders, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

8. The term “document” is intended to have the broadest possible meaning under Rule 34 of the Federal Rules of Civil Procedure and includes, without limitation, any writings, drawings, graphs, charts, photographs, phone records, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the respondent through detection devices into reasonably usable form, or other information, including originals, translations and drafts thereof and all copies bearing notations and marks not found on the original. The term “document” includes, without limitation, affidavits, analyses, appointment books, appraisals, articles from publications, audit and scope plans (whether in paper, database, electronic or other format(s)), audit workpapers (whether in paper, database, electronic or other format(s)), books, books of account, account statements, cables, calendars, charts, checks (cancelled or uncanceled), check stubs, confirmations, contracts, correspondence, credit card receipts, desk calendars, desk pads, diaries, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, invoices, journals, ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, partners’ and employees’ personnel files, partners’ and employees’ review check lists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies,

summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheets or things similar to any of the foregoing however denominated. The term “document” further includes email and electronic communication whether stored on a personal computer, network computer system, backup computer tape and/or disk, or by some other storage mechanism. The term “document” further means any document now or at any time in the possession, custody, or control of the entity to whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term “control” as used in the preceding sentence, a person is deemed to be in control of a document if the person has the right to secure the document or a copy thereof from another person having actual possession thereof, including, but not limited to, work product contracted by you from professional firms.

9. “Ingram Micro” means Ingram Micro Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

10. “Leveraged Recapitalization” means a series of transactions occurring in August 2004 in which Thomas H. Lee Partners, together with certain affiliates and co-investors, acquired approximately 57 percent of the equity interests in New Refco Group Ltd, LLC (“New Refco”) in a leveraged recapitalization and any transaction whether before or after August 2004 directly or indirectly connected to THL’s acquisition of the 57 percent stake in New Refco.

11. “Liberty Corner” means Liberty Corner Capital Strategies, LLC (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers,

employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

12. “Refco” means Refco, Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), including without limitation, Refco Group Ltd. LLC (“RGL”), New Refco and Refco Capital Markets Ltd. (“RCM”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

13. “Refco Engagement” means all the work performed by you in relation to or on behalf of Refco, or in relation to or on behalf of Thomas H. Lee Partners concerning Refco, including, without limitation, debt offerings, audits of Refco’s financial statements, preparation for an initial public offering, preparation of a prospectus and registration statement for an initial public offering, agreed upon procedures, letters to underwriters, memoranda, letters and/or opinions as to accounting policies and issues, assistance in communicating with the SEC and other regulatory bodies, preparation of consolidated financial statements and any other examination, consultation, review or tax assistance.

14. “RGHI” means Refco Group Holdings, Inc. directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on its behalf.

15. “RGHI Engagement” means all the work performed by you in relation to or on behalf of RGHI.

16. “Refco Securities” means any note, stock, treasury stock, debenture, evidence of indebtedness, collateral trust certificate, transferable share, voting trust certificate, or

any other certificate of interest or participation (whether permanent, temporary or interim), or any warrant, option or right to subscribe to or purchase any of the foregoing concerning Refco.

17. “Thomas H. Lee Partners” means Thomas H. Lee Partners L.P., a partnership, its predecessors, all parents, subsidiaries, partners, principals, managers and employees and any successors in interest.

18. The words “you” or “your” means you and any or all past or present employees, partners, agents, representatives, officers, attorneys, or other persons or entities acting or purporting to act for or on your behalf.

19. The terms “all” and “each” shall be construed as “all and each.”

20. “Family” means your parents, children, spouse, former spouse, siblings and/or significant other(s), including domestic partners.

21. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

INSTRUCTIONS

A. The documents covered by this request include all documents in your possession, custody or control. Unless otherwise specified, each request herein seeks all documents generated or received by you during the period from January 1, 2000 through and including the date of production.

B. Each request for the production of documents shall be deemed to be continuing in nature. If at any time additional documents come into your possession, custody or control or are brought to your attention, prompt supplementation of your response to these requests is required.

C. You shall produce all documents in the manner in which they are maintained in the usual course of your business and/or you shall organize and label the documents to correspond with the categories in this request. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

D. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

E. Documents shall be produced in such fashion as to identify the department, branch or office in which they were located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian(s).

F. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

G. Documents attached to each other should not be separated.

H. Documents not otherwise responsive to this discovery request shall be produced if such documents mention, discuss, refer to, or explain the documents which are called for by this discovery request.

I. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

J. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, accountants, investigators, or by your attorneys or their agents, employees, representatives or investigators.

K. If you object to any part of any request, you shall state fully in writing the nature of the objection. Notwithstanding any objections, you shall nonetheless comply fully with the other parts of the request to which you are not objecting.

L. Each document request shall be construed independently and not with reference to any other document request for the purpose of limitation.

O. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning Refco, RGHI, Liberty Corner, Ingram Micro, BAWAG, Thomas H. Lee, Delta, the Refco Engagement and/or the RGHI Engagement.

REQUEST NO. 2:

All documents concerning your work in connection with the Refco Engagement or the RGHI Engagement, including but not limited to, all workpapers and any other documents that you relied upon, considered, collected, referred to, created or amended.

REQUEST NO. 3:

All documents concerning any transaction, including but not limited to loans, transfers, investments, involving Refco, or RGHI or any other entity controlled by any member, past or present, of Refco's management or board of directors, on the other, from January 1, 1995.

REQUEST NO. 4:

All documents concerning transactions, including but not limited to loans, transfers or investments, between Refco, RGHI, Thomas H. Lee Partners, Delta or Liberty Corner, on the one hand, and any Refco officer, director or employee, past or present, on the other hand from January 1, 1997.

REQUEST NO. 5:

All documents concerning transactions, including but not limited to loans, transfers or investments, between Refco or RGHI, on the one hand, and Liberty Corner, Ingram Micro or Delta on the other, from January 1, 1997.

REQUEST NO. 6:

All documents concerning any loan by Refco to a Refco customer that also had a loan or other obligation to or from RGHI or any other entity controlled by any member, past or present, of Refco's management or Board of Directors.

REQUEST NO. 7:

All documents reflecting transactions, including but not limited to loans, inter-company transfers, other transfers or investments, between any of Refco's subsidiaries or Refco, on the one hand, and any other of Refco's subsidiaries or Refco, on the other.

REQUEST NO. 8:

All documents describing or illustrating Refco's organizational structure.

REQUEST NO. 9:

All documents concerning Refco's internal accounting controls, including, but not limited to, all documents that relied upon, considered, collected, referred to, created or amended in connection with performing studies and/or evaluations of Refco's internal accounting controls.

REQUEST NO. 10:

All financial statements and/or reports concerning Refco, whether or not issued, including, without limitation, audit reports, agreed-upon procedures and other special reports, consulting reports, letters, and recommendations to the Refco management or Board of Directors, management advisory letters, compliance reports, internal accounting control reports, material deficiency reports, program reports, cost reports, financial statement reports, reports of material weaknesses and reports of reportable conditions.

REQUEST NO. 11:

All documents concerning Refco's SEC filings.

REQUEST NO. 12:

All documents concerning Refco's financial statements, including but not limited to any restatement or planned restatement of Refco's financial statements.

REQUEST NO. 13:

All documents concerning any communication (including but not limited to email or other electronic communication) relating to Refco, the Refco Engagement, RGHI and/or the RGHI Engagement.

REQUEST NO. 14:

All of your permanent files, correspondence files, and internal memoranda concerning Refco, the Refco Engagement, RGHI and/or the RGHI Engagement.

REQUEST NO. 15:

All documents concerning any internal reviews of you or any of your divisions, departments, partners, directors, employees or agents of any services provided to Refco by you.

REQUEST NO. 16:

All internal manuals, statements of policies and procedures, audit procedure guides and your industry audit and accounting guides in effect at any time during examinations of the financial statements of Refco. If the manuals and guides in effect during your audit examinations of Refco in this time are no longer available, then this Request also calls for the production of the earliest versions of the manuals and guides that were prepared after your audit examinations of Refco and that are now available.

REQUEST NO. 17:

All documents referring to, describing, suggesting or alleging possible violations of professional standards in the services provided to Refco and/or RGHI.

REQUEST NO. 18:

All engagement letters, consulting contracts or other documents constituting, referring to or relating to any agreements with Refco, RGHI or concerning the Refco

Engagement, including any and all subcontracts or other arrangements with third parties in connection with the Refco Engagement including, but not limited to, valuations, forensic reports or opinions.

REQUEST NO. 19:

All documents concerning the decision to accept, or continue to represent Refco as client, including, but not limited to, any new client form or continuing client form or new client memoranda or continuing client memoranda concerning Refco or the Refco Engagement.

REQUEST NO. 20:

All billing files or their equivalent, and their constituent parts, relating to Refco, the Refco Engagement, RGHI or the RGHI Engagement including, without limitation, records of time and out-of-pocket expenses incurred, and documents relating to billings and collection of these items.

REQUEST NO. 21:

All working files, correspondence files, desk files or personal files of any of your partners, directors or other employees concerning Refco, the Refco Engagement, the RGHI Engagement and/or RGHI.

REQUEST NO. 22:

All time sheets, mark-ups and other time records or summaries thereof (including, but not limited to, internal billing memoranda) concerning the amount of time each of your professional employees, directors and partners spent on a daily, weekly, semi-monthly, monthly, annual, or other periodic, basis in providing service to Refco or to RGHI.

REQUEST NO. 23:

All desk or pocket diaries, calendar entries, notes, expense reports or records of any of your partners, directors or employees concerning Refco, the Refco Engagement, the RGHI Engagement and/or RGHI.

REQUEST NO. 24:

All documents provided or available to the persons assigned to the Refco Engagement, or any part thereof, to prepare such persons for the Refco Engagement or referred to during such engagement, including, without limitation, training or instruction manuals, audit guides, program materials, and audit reports on other entities.

REQUEST NO. 25:

All personnel records of client service professionals assigned to the Refco Engagement, including, but not limited to, assignment schedules, chargeable hours, technical training records, performance evaluations, promotion assessments, salary and raises received, and CPA exam scores.

REQUEST NO. 26:

Documents sufficient to identify all of your current or former personnel who were hired by Refco or RGHI.

REQUEST NO. 27:

Documents sufficient to identify your policies and procedures concerning file, document, or other information retention and/or destruction.

REQUEST NO. 28:

All statements, transcripts of testimony, communications and documents provided to the SEC, any Committee of Congress, the Attorney General of New York or any other federal,

state or other regulatory authority or agency, grand jury or any party in connection with any lawsuit concerning Refco, the Refco Engagement, RGHI, the RGHI Engagement, Delta, Liberty Corner or BAWAG.

REQUEST NO. 29:

All statements, transcripts of testimony, communications and documents provided to the American Institute of Certified Public Accountants or any other professional association of certified public accountants regarding Refco, the Refco Engagement, RGHI, the RGHI Engagement, Thomas H. Lee Partners or BAWAG.

REQUEST NO. 30:

All prepared statements and/or transcripts of testimony given by any of partners, directors or employees involved in the Refco Engagement.

REQUEST NO. 31:

Documents sufficient to identify whether any partner, director or employee who performed services in connection with the Refco Engagement has been the subject of any disciplinary action, adverse performance review or claim for professional malpractice.

REQUEST NO. 32:

All contracts, policies or other documents which purport to obligate any person, party or entity to insure or otherwise reimburse for or against claims relating to professional malpractice or negligence.

REQUEST NO. 33:

All documents which refer, reflect or relate to communications by any person with any insurance carriers concerning Refco, the Refco Engagement, RGHI or the RGHI Engagement.

REQUEST NO. 34:

Documents sufficient to identify the nature and amount of all claims against you concerning Refco or the Refco Engagement.

REQUEST NO. 35:

All documents which refer, reflect or relate to the purchase and/or sale of any Refco Securities by any partner, director and/or employee.

REQUEST NO. 36:

All documents concerning any business or professional relationship, other than the Refco Engagement or the RGHI Engagement, between you and Refco, RGHI, Thomas H. Lee Partners or Bennett.

REQUEST NO. 37:

All documents concerning any and all additional events or circumstances that you reasonably believe contributed to Refco's filing for bankruptcy protection.

REQUEST NO. 38:

All documents concerning any past (since January 1, 1995) or present board member or executive of Refco, including but not limited to Bennett, Gerald M. Sherer, Tone Grant, Robert Trosten, William Sexton and/or Santo Maggio.

REQUEST NO. 39:

All documents concerning PlusFunds Group, Inc., Betio Asset Investments Ltd., Chaco City Investments Ltd., Rabaul Holdings Ltd., Tecka Asset Holdings Ltd., Tuvalu Holding Company, Ltd., Catamarca Asset Series, I, Ltd., Liquid Opportunity, Liquid Opportunity-Plus Fund, Alpha Capital AG, Jonathan Knight, Mark Kavanagh, Suffolk LLC and/or Chris Sugrue.

**SCHEDULE OF DOCUMENTS TO BE PRODUCED BY:
McDermott Will & Emery**

DEFINITIONS

The terms used herein shall have the meanings ascribed to them in the definitions set forth below.

1. “BAWAG” means BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft, any of its subsidiaries (and any predecessors thereof) including but not limited to, BAWAG Overseas Inc. (“BAWAG Overseas”) and Alinea Holding GmbH (“Alinea”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

2. “Bank Frick” means Frick Bank & Co., a corporation organized under the laws of Liechtenstein, any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

3. “Bennett” means Phillip R. Bennett.

4. “Board of Directors” means Refco’s Board of Directors or Board of Managers and any of Refco’s Board of Directors’ or Board of Managers’ subcommittees.

5. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

6. “Delta” means Delta Flyer Fund, LLP. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates,

representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

7. “Desana” means Desana Foundation, a Lichtenstein Stiftung (Lichtenstein Foundation), any of its subsidiaries, directors, officers, shareholders, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

8. “DF Capital” means DF Capital Inc., a corporation organized under the laws of Delaware, any of its subsidiaries, directors, officers, shareholders, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

9. The term “document” is intended to have the broadest possible meaning under Rule 34 of the Federal Rules of Civil Procedure and includes, without limitation, any writings, drawings, graphs, charts, photographs, phone records, electronic, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary, by the respondent through detection devices into reasonably usable form, or other information, including originals, translations and drafts thereof and all copies bearing notations and marks not found on the original. The term “document” includes, without limitation, affidavits, analyses, appointment books, appraisals, articles from publications, audit and scope plans (whether in paper, database, electronic or other format(s)), audit workpapers (whether in paper, database, electronic or other format(s)), books, books of account, account statements, cables, calendars, charts, checks (cancelled or uncanceled), check stubs, confirmations, contracts, correspondence, credit card receipts, desk calendars, desk pads, diaries, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, invoices, journals,

ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, partners' and employees' personnel files, partners' and employees' review check lists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies, summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheets or things similar to any of the foregoing however denominated. The term "document" further includes email and electronic communication whether stored on a personal computer, network computer system, backup computer tape and/or disk, or by some other storage mechanism. The term "document" further means any document now or at any time in the possession, custody, or control of the entity to whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term "control" as used in the preceding sentence, a person is deemed to be in control of a document if the person has the right to secure the document or a copy thereof from another person having actual possession thereof, including, but not limited to, work product contracted by you from professional firms.

10. "Ingram Micro" means Ingram Micro Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

11. "Leveraged Recapitalization" means a series of transactions occurring in August 2004 in which Thomas H. Lee Partners, together with certain affiliates and co-investors, acquired approximately 57 percent of the equity interests in New Refco Group Ltd, LLC ("New

Refco”) in a leveraged recapitalization and any transaction whether before or after August 2004 directly or indirectly connected to THL’s acquisition of the 57 percent stake in New Refco.

12. “Liberty Corner” means Liberty Corner Capital Strategies, LLC (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf, including but not limited to any affiliated investment vehicles or management companies.

13. “Refco” means Refco, Inc. (and any predecessor thereof), any of its subsidiaries (and any predecessors thereof), including without limitation, Refco Group Ltd. LLC (“RGL”), New Refco and Refco Capital Markets Ltd. (“RCM”), directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on their behalf.

14. “RGHI” means Refco Group Holdings, Inc. directors, officers, employees, affiliates, representatives, advisors, agents, attorneys, associates or any other person acting on its behalf.

15. “Refco Securities” means any note, stock, treasury stock, debenture, evidence of indebtedness, collateral trust certificate, transferable share, voting trust certificate, or any other certificate of interest or participation (whether permanent, temporary or interim), or any warrant, option or right to subscribe to or purchase any of the foregoing concerning Refco.

16. “Thomas H. Lee Partners” means Thomas H. Lee Partners L.P., a partnership, its predecessors, all parents, subsidiaries, partners, principals, managers and employees and any successors in interest.

17. The words “you” or “your” means you and any or all past or present employees, partners, agents, representatives, officers, attorneys, or other persons or entities acting or purporting to act for or on your behalf.

18. The terms “all” and “each” shall be construed as “all and each.”

19. “Family” means your parents, children, spouse, former spouse, siblings and/or significant other(s), including domestic partners.

20. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

INSTRUCTIONS

A. The documents covered by this request include all documents in your possession, custody or control. Unless otherwise specified, each request herein seeks all documents generated or received by you during the period from January 1, 2000 through and including the date of production.

B. Each request for the production of documents shall be deemed to be continuing in nature. If at any time additional documents come into your possession, custody or control or are brought to your attention, prompt supplementation of your response to these requests is required.

C. You shall produce all documents in the manner in which they are maintained in the usual course of your business and/or you shall organize and label the documents to correspond with the categories in this request. A request for a document shall be deemed to include a request for any and all file folders within which the document was

contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

D. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

E. Documents shall be produced in such fashion as to identify the department, branch or office in which they were located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian(s).

F. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

G. Documents attached to each other should not be separated.

H. Documents not otherwise responsive to this discovery request shall be produced if such documents mention, discuss, refer to, or explain the documents which are called for by this discovery request.

I. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.

J. In producing documents and other materials, you are requested to furnish all documents or things in your possession, custody or control, regardless of whether such documents or materials are possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, accountants, investigators, or by your attorneys or their agents, employees, representatives or investigators.

K. If you object to any part of any request, you shall state fully in writing the nature of the objection. Notwithstanding any objections, you shall nonetheless comply fully with the other parts of the request to which you are not objecting.

L. Each document request shall be construed independently and not with reference to any other document request for the purpose of limitation.

O. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning Refco, RGHI, Alinea, BAWAG Overseas, Bank Frick, BAWAG, DF Capital, and Desana.

REQUEST NO. 2:

All business agreements, engagement letters or retainer agreements, whether formal or informal between yourself on one hand, and Refco, RGHI, Alinea, BAWAG Overseas, Bank Frick, BAWAG, DF Capital, Desana or Bennett on the other.

REQUEST NO. 3:

All documents concerning any compensation, payment or transfer of funds of any kind, whether in cash, options, loans, Refco securities or any other thing of value (each a

“Payment”), received by you or any member of your Family, from Refco, RGHI, Bennett, Alinea, BAWAG Overseas, BAWAG, DF Capital, Desana, or Thomas H. Lee Partners, including documents sufficient to show the date and amount of each such Payment, any subsequent transfer of each Payment, and the current location of each Payment.

REQUEST NO. 4:

All correspondence between you and Bennett, or you and any other Refco executive or board member, Refco and/or RGHI.

REQUEST NO. 5:

All correspondence between you and any past or present employee of Alinea, BAWAG, Bank Frick., BAWAG Overseas, DF Capital or Desana, including but not limited to any BAWAG executive or board member.

REQUEST NO. 6:

All documents concerning the Leveraged Recapitalization.

REQUEST NO. 7:

All documents concerning Refco’s initial public offering on or about August 16, 2005, including but not limited to documents concerning to the preparation and filing of documents with the SEC related to Refco’s initial public offering.

REQUEST NO. 8:

All documents concerning transactions, including but not limited to loans, transfers or investments, that involved Refco, Phillip Bennett, RGHI, Thomas H. Lee Partners, BAWAG, BAWAG Overseas, Alinea, Bank Frick, DF Capital, Desana, or any other entity controlled by any member, past or present, of Refco’s or BAWAG’s management or Board of Directors, from January 1, 1995.

REQUEST NO. 9:

All documents concerning any loan by Refco to a Refco customer that also had a loan or other obligation to or from RGHI or any entity controlled by any member, past or present, of Refco's management or Board of Directors.

REQUEST NO. 10:

All statements, transcripts of testimony, communications and documents you or members of your Family provided to the SEC, any Committee of Congress, any federal, state or other regulatory authority or agency, any grand jury or in any litigation or arbitration concerning Refco, RGHI, Bennett, Alinea, BAWAG, BAWAG Overseas, DF Capital or Desana.

REQUEST NO. 11:

Document sufficient to identify any legal or equitable claims, including the nature and amount of all such claims, asserted against you or members of your Family concerning Refco.

REQUEST NO. 12

All documents which refer, reflect or relate to insurance coverage or communications by any person with any insurance carriers concerning Refco.

REQUEST NO. 13

All documents concerning communications between you and any of Refco, or RGHI's agents, directors or officers, including but not limited to in-house or outside counsel.

REQUEST NO. 14:

All documents concerning any and all additional events or circumstances that you reasonably believe contributed to the Refco's filing for bankruptcy protection.

REQUEST NO. 15:

All documents concerning, Delta and/or Liberty Corner, Ingram Micro, PlusFunds Group, Inc., Betio Asset Investments Ltd., Chaco City Investments Ltd., Rabaul Holdings Ltd., Tecka Asset Holdings Ltd., Tuvalu Holding Company, Ltd., Catamarca Asset Series, I, Ltd., Liquid Opportunity, Liquid Opportunity- Plus Fund, Alpha Capital AG, Jonathan Knight, Mark Kavanagh and/or Chris Sugrue.