

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Anwar, *et al.*,

Plaintiffs,

v.

Fairfield Greenwich Limited, *et al.*,

Defendants.

09 Civ. 0118 (VM)  
ECF Case

**THE CITCO ADMINISTRATORS' FIRST SET OF  
REQUESTS FOR ADMISSION TO PLAINTIFFS**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants Citco Fund Services (Europe) B.V. and Citco (Canada) Inc. (collectively, the "Citco Administrators") hereby request that, within thirty (30) days of the date of service of these Requests for Admission, and in accordance with the following Definitions and Instructions, Plaintiffs answer in writing and under oath, the following Requests for Admission (the "Requests"):

**DEFINITIONS**

1. Defendant incorporates by reference the Uniform Definitions in Discovery Requests set forth in Rule 26.3 of the Local Rules.

2. "Plaintiff," "You," "Your," or "Class" means all members of the class certified under Federal Rule of Civil Procedure 23(b) by the District Court on February 25, 2013, and modified by stipulation among the parties on May 7, 2013, and, where applicable, any and all of their respective agents, advisors, officers, directors, administrators, members, employees, partners, trustees, fiduciaries, investigators,

representatives, attorneys, successors-in-interest, corporate parents, subsidiaries or affiliates, and all other persons or entities acting on their behalf or under their control.

3. “Your Investment” includes each and every subscription, switch, transfer, or redemption made by You or on Your behalf in any of the Funds.

4. “Your Initial Investment” means the first investment made by You or on Your behalf in the Funds, as distinguished from subsequent investments and decisions to maintain existing investments in Paragraph 335 of the SCAC, as amended on May 14, 2014.

5. “Include” and “including” shall each be interpreted in every instance as being illustrative of the information requested, shall be read as “including, but not limited to,” and shall not be interpreted to exclude any information otherwise within the scope of these Requests.

6. “CFSE” means Defendant Citco Fund Services (Europe) B.V.

7. “CCI” means Defendant Citco (Canada) Inc.

8. The “Funds” means Fairfield Sentry, Fairfield Sigma, Greenwich Sentry, and Greenwich Sentry Partners.

9. “Fairfield Sentry” means Fairfield Sentry Limited, a hedge fund that was incorporated as an international business company in the British Virgin Islands.

10. “Fairfield Sigma” means Fairfield Sigma Limited, a hedge fund that was incorporated as an international business company in the British Virgin Islands.

11. “Greenwich Sentry” means Greenwich Sentry, L.P., a private investment limited partnership that was organized under the laws of Delaware.

12. “Greenwich Sentry Partners” means Greenwich Sentry Partners, L.P., a private investment limited partnership that was organized under the laws of Delaware.

13. “NAV” means the Net Asset Value of any of the Funds.

14. “Net Asset Value” means the value of the Funds’ assets, as described in the Funds’ Private Placement Memoranda, such as, for example, in ANWAR-C-ESI-00187545.

15. “NAV Statements” mean statements sent by CFSE or CCI to You containing the NAVs or capital account balances of Your Investments, such as the documents at SICO 0010327 and FGANWH000073639.

16. “SCAC” means the Second Consolidated Amended Complaint dated September 29, 2009 in the above-captioned action, as amended on May 14, 2014.

17. “Subscription Documents” mean the documents sent by You in order to become subscribed in any of the Funds, as described in Paragraph 335 of the SCAC, as amended on May 14, 2014, and as reflected in, for example, ANWAR-CCI-00000115 – 24.

### **INSTRUCTIONS**

1. Each Request shall be answered completely and separately.
2. Each Request is required to be answered on the basis of Your entire knowledge.
3. Each Request calls not only for Your knowledge, but also all information that is available to You by reasonable inquiry and due diligence, including inquiry of Plaintiffs’ agents, representatives and attorneys.

4. If You are not able to admit or deny a Request due to lack of information or knowledge, please affirm that a reasonable inquiry was made and that information known or readily obtainable is insufficient to enable admission or denial.

5. To the extent that a Request is denied or qualified in any way such that the response is anything other than an unqualified admission, set forth in detail for each such denial or qualification all factual bases for the denial or qualification and identify all documents that support in any way the refusal to admit unequivocally, together with the identity of the custodian(s) of any such document(s).

6. If You object to answering any Request herein, in whole or in part, on any ground, You shall state the nature of the objection and answer all remaining parts of the Request.

7. If a claim of privilege is asserted, in whole or in part, with respect to any Request, please provide the information required pursuant to Rule 26(b)(5) of the Federal Rules of Civil Procedure and Local Civil Rule 26.2.

8. In the event that You object to any Request on the basis that it is overbroad for any reason, respond to that Request narrowed in such a way as to render it not overbroad in Your opinion, and state the extent to which You have narrowed the Request for purposes of Your response.

9. If a Request cannot be answered in full, it should be answered to the extent possible, with an explanation as to why the remainder cannot be answered, disclosing whatever information, knowledge, or belief You do have with respect to the unanswered portion, including the name(s) and address(es) of any person(s) or entity(ies) having further information.

10. Pursuant to Fed. R. Civ. P. 36(a), a denial shall fairly meet the substance of the requested admission, and when good faith requires that You qualify an answer or deny only a part of the matter of which an admission is requested, You shall specify so much of it as is true and qualify or deny the remainder.

11. If, in answering these Requests, You claim any ambiguity in a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering the Request.

12. Where knowledge or information in the possession or control of a Party is requested or inquired of; such request or inquiry also seeks knowledge or information in the possession or control of the Party's agents, servants, employees, representatives, managers, investment advisors, attorneys, accountants, and independent contractors, or other persons acting for or on behalf of the Party.

13. If any of the following Requests call for the identification or reference to Documents that You know to be missing, destroyed or otherwise disposed of, identify such Documents and give particular details as to the disposition of each Document, the identity of the person last known to have the Document in his or her possession or subject to his or her control, and the identity of each person You have reason to believe had knowledge of its contents or received a copy of the Document.

14. These Requests are continuing in nature. If at any time after initial compliance with the Requests You obtain further or different information, You must file supplemental responses.

**REQUESTS FOR ADMISSION****Request No. 1**

Admit that You did not receive any NAV Statements for any of the Funds directly from CFSE prior to deciding to make Your Initial Investment in any of the Funds.

**Request No. 2**

Admit that You had already made Your decision to invest initially in any of the Funds prior to submitting Your Subscription Documents to CFSE.

**Request No. 3**

Admit that You did not receive any NAV Statements for any of the Funds directly from CCI prior to deciding to make Your Initial Investment in any of the Funds.

**Request No. 4**

Admit that You had already made Your decision to invest initially in any of the Funds prior to submitting Your Subscription Documents to CCI.

Dated: New York, New York  
May 23, 2014

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By:



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*Citico Fund Services (Europe) B.V. and Citico  
(Canada) Inc.*

AFFIDAVIT OF SERVICE BY FEDERAL EXPRESS

STATE OF NEW YORK    )  
  )  
COUNTY OF NEW YORK ) ss.:

AUSTIN K. WILKINSON, being duly sworn, deposes and says:

1. I am not a party to this action, am over 18 years of age and am employed by Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019.

2. On May 23, 2014, I served true copies of THE CITCO ADMINISTRATORS' FIRST SET OF REQUESTS FOR ADMISSION TO PLAINTIFFS and THE CITCO ADMINISTRATORS' SECOND SET OF CONTENTION INTERROGATORIES TO PLAINTIFFS on the following:

Stuart Singer  
Boies Schiller & Flexner LLP  
401 East Las Olas Blvd, Suite 1200  
Fort Lauderdale, FL 33301

Sarah Loomis Cave  
Hughes Hubbard & Reed LLP  
1 Battery Park Plaza  
New York, NY 10004

Timothy A. Duffy  
Kirkland & Ellis LLP  
300 North LaSalle Street  
Chicago, IL 60654

3. I made such service by placing true copies of the aforementioned documents in properly addressed prepaid wrappers and delivering them to a Federal Express office for Priority Overnight Delivery.



Austin K. Wilkinson

Sworn to before me this  
23<sup>rd</sup> day of May, 2014

  
Notary Public

**TREVOR J. HILL**  
Notary Public, State of New York  
No. 60-6181594  
Qualified in Westchester County  
Certificate Filed in New York County  
Commission Expires Feb. 4, 2016