

EXHIBIT D

March 14, 2008

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Re: ICR/Harris/Fish & Richardson

Dear Paul and Karen:

Thanks for Karen's letter of March 13 and Paul's e-mail of the same date responding to my earlier communications to Paul about the deposition schedule and other open discovery issues. We remain interested in setting a time as soon as possible to meet and confer about the deficiencies in ICR's and Mr. Harris' privilege log and production. Please let me know when we can set up a time to discuss these issues. Frankly, it's frustrating that you repeatedly have argued to the Court that we have not satisfied our meet and confer obligations, and yet continuously ignore our invitations to discuss any of these issues.

As for the deposition schedule, although we have offered to produce Mr. Devlin in Chicago on April 16, we are not willing to produce all of the witnesses you have noticed in Chicago. Contrary to the suggestion in your letter, it was ICR, not Fish & Richardson, that initiated the litigation in this district by filing an amended complaint against Fish & Richardson. Fish & Richardson's counterclaim against ICR and third party complaint against Mr. Harris was filed in response to ICR's decision to pursue its claim in Chicago.

Moreover, Fish & Richardson is incorporated in Massachusetts, and although it has offices in various cities across the United States, and elsewhere, it does not have an office in Illinois. Importantly, none of the persons you have noticed for deposition from Fish & Richardson reside in Illinois (Peter Devlin -- Boston; John Steele -- Northern California; John Philips -- Southern California; Kathi Lutton -- Northern California; John Dragseth -- Minneapolis; Ruffin Cordell -- Washington, D.C.; Dorothy Whelan -- Minneapolis; and Sharon Gebhart -- Southern California.) If you believe it important to depose each of these persons, we are willing to work with you on dates to develop as efficient a schedule as possible, but these individuals should not have to travel to Chicago to be deposed to suit your convenience. We are continuing to work on dates for the remaining depositions, but before we line up dates, we should reach some resolution on whether you are prepared to move forward with the depositions for which we already have proposed dates and locations.

With regards to Mr. Parker, we are prepared to proceed with his examination on April 14. Who will be appearing for ICR? If Mr. Parker will be designated in response to our separate notice to

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ICR, we reserve our rights to take the fully allotted time with the ICR witness and Mr. Parker in his individual capacity, as per the separate subpoena and notice we have served. Additionally, your effort to link making Mr. Parker available only on the condition that Fish witnesses be deposed in Chicago is unacceptable. As we've said previously, we're prepared to depose Mr. Parker in Florida where he resides, if necessary. There is no basis for you holding that deposition at bay.

Again, we need to lock in dates as soon as possible, and thus I would appreciate your prompt confirmation of the schedule, or if you wish to discuss the issue further, please let me know when you are available. Thanks.

Very truly yours,



Terrence J. Truax

cc: Raymond P. Niro (via e-mail rniro@nshn.com)
David J. Bradford
Eric A. Sacks