

Exhibit D



WILLENKEN
WILLENKEN WILSON LOH & LIEB LLP

August 6, 2010

VIA ELECTRONIC MAIL
AND U.S. MAIL

Enrico Schaefer, Esq.
Traverse Legal
810 Cottageview Drive, Suite G-20
Traverse City, MI 49684

Re: *Weather Underground v. Navigation Catalyst Systems, Inc.*

Dear Enrico:

I refer to your letter of August 5, 2010 and wanted to respond to the points therein as best as I can at this point in time.

1. As we have informed you time and again (and, indeed, as I informed the Court during the hearing on your Motion to Compel), NCS does not have the ability to generate historic lists of its domain name portfolios. Further, as I have previously informed you, and although NCS is under no obligation to do so, NCS was able to request such a historical list for two separate dates from Iron Mountain (after convincing ICANN). NCS is awaiting the production of those lists to us so that we can produce them to Plaintiff.

As to your request regarding Domain Tools, I have placed a call to Domain Tools to determine (i) what it is it can provide, (ii) its methodology, and (iii) the cost for this project. I have not received a telephone call back. Until I speak with someone at Domain Tools about these things, I can neither agree nor disagree with your request.

2. I disagree with your characterization of these documents. That said, I have asked my client to determine whether it has any completed spreadsheets in its possession, custody, and/or control. To date, none has been located.
3. The inputs referenced in NCS000184 refer to "data" not databases. There are no databases to produce. I am in the process of consulting with my client to determine what data is in NCS's possession, custody, and/or control and, assuming such data exists, can confirm next week what data exists, what form it



exists in and how it can be produced.

4. We cannot agree to this request. To the contrary, I would like to meet and confer with you on Defendant's Motion for Summary Judgment on its Affirmative Defense of Lack of Personal Jurisdiction. Please give me a call to discuss at your convenience.

As for the Monday deadline for your Motion to Compel, you know that I was in Michigan until yesterday (Thursday) and only returned to my office today (Friday). I have numerous other cases, all of which require my attention, particularly after nearly a week away from the office. I will do my best to definitively answer your requests as quickly as possible but cannot sacrifice all of my other clients to meet your unilaterally set deadline. If you want to have a meaningful meet and confer, then I suggest you wait for me to get back to you with further details next week (e.g., after I can actually speak with Domain Tools).

If you have any further questions, please feel free to call me.

Very truly yours,



William A. Delgado

cc: Mike Huget