

## EXHIBIT D

February 3, 2012

**VIA EMAIL ONLY**

William A. Delgado  
Willenken Wilson Loh & Lieb LLP  
707 Wilshire Boulevard, Suite 3850  
Los Angeles, CA 90017

**Re: Trial Witness Issues**

Dear Mr. Delgado:

Again, please provide the current employer and last contact information for each of the employees you identify in your November 29, 2011 letter. I cannot simply rely on you to bird-dog these critical witnesses. I will, under all circumstances, still need to send them subpoenas as they are not within your control. To the extent they are working for a "related company", please indicate that this is the case.

With regard to Mr. Art Shaw, Please provide all contact information for him as well. The same goes for Seth Jacoby. Obviously, we are entitled to take de bene esse depositions for the purposes of trial. We certainly will be doing so.

We formally request that you supplement discovery with regards to identifying all current "related companies" as defined under the court's prior rulings. We understand those rulings deal with domain names which are variations of Weather Underground marks. This would require you to do a comprehensive inventory for any related company which is registering, trafficking in or using domain names to determine whether or not there are any identical or similar domains within those portfolios. Please indicate whether or not you are willing to do so without further motion practice no later than December 12, 2011. I look forward to hearing from you.

Sincerely,

TRAVERSE LEGAL, PLC



Enrico Schaefer  
[enrico@traverselegal.com](mailto:enrico@traverselegal.com)

ES/cad