Exhibit D

Matt Rappaport

From:	Matt Rappaport
Sent:	Sunday, December 26, 2010 12:20 PM
To:	'melsheimer@fr.com'; 'mcnabnay@fr.com'; 'mukherji@fr.com'; 'bruce@fr.com'
Cc:	Eolas

Subject: Eolas - Go Daddy Source Code Production

Dear Counsel for Go Daddy,

As explained below, Go Daddy's production of source code, as made available on November 17, 2010 was deficient. Eolas requests that Go Daddy produce source code for all versions of the accused products over the damages period (October 2003 to present). This source code should be produced in its native format and folder structure, without any password protection.

The deficiencies in Go Daddy's source code production were numerous. Eolas expects that these deficiencies will be remedied in advance of our next source code inspection (date to be determined). As a threshold issue, the produced code was not made available in the form it is maintained by GoDaddy. Incredibly, Go Daddy's production consisted of 70,221 separate folders of source code, each folder having one file.

This folder structure, in addition to deviating from the form in which the code is maintained by Go Daddy, is unduly cumbersome and unreasonably restricted our reviewer's efforts—in contravention of paragraph 13(b)(ii) of the Protective Order. The sheer number of folders caused delay in routine operations. For example, each time our reviewers tried to open the Source Code folder containing those 70,221 folders, the computer "froze." Thus, even simple navigation amongst the folders was extremely time consuming. To give a concrete example, a simple keyword search took 4-5 minutes to complete. Going forward, we expect Go Daddy to produce its source code as it is maintained, in its native folder structure.

Furthermore, the folder structure GoDaddy has employed further impedes Eolas' ability to review by removing all information about how each individual file is used on GoDaddy's accused webpages in relation to other files. For example, the javascript files "fcns.js" and "gdtv_jquery_ui_3.min.js" were located inside folders named 60782, 69432, etc. rather than in their native directories. It is thus unclear how, if at all, these produced files are used by / appear in Go Daddy's webpage.

Separately, at least one of the folders (folder number 5845) among the 70,221 folders had a zip file named CurrentWebApps.GD.COMsite. Our reviewers attempted to extract the files from this zip file, but found some of the files were password protected. Going forward, please ensure that there is not password protection on any of the source code Go Daddy produces. This password protection unreasonably impedes our ability to review Go Daddy's source code—again, in contravention of paragraph 13(b)(ii) of the Protective Order.

Moreover, apart from deficiencies in the source code production, Go Daddy did not install each of the source code review tools Eolas provided (e.g. Adobe CS5 and Eclipse). Going forward, please ensure such tools are installed in advance of our review. We understand from our reviewers' previous discussions with Proshanto Mukherji that Go Daddy will also install Microsoft Office on the source code review computer. Thank you.

Finally, please respond indicating whether the produced code is meant to be representative of Go Daddy's source code for the accused products over the damages period (October 2003 to present). As we have indicated over the past months, absent a stipulation to this effect, Go Daddy

3/7/2011

must produce all code for the accused products over the damages period. We have yet to hear from you on this issue. In this vein, the date of the already-produced code is not apparent to Eolas, but it appears that code for only a single date was produced. Please advise.

We appreciate your attention to these issues. As mentioned previously, we will be conducting additional review of Go Daddy's source code; at that time we expect Go Daddy's code to be produced as set forth herein. Once a date for that review is available we will contact you. In the meantime, we remain available should you wish to discuss producing source code that is representative over all or some of the damages period.

Sincerely,

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3/7/2011