

EXHIBIT D

Stacia Lay

From: Stacia Lay
Sent: Friday, August 27, 2010 4:33 PM
To: 'Heather Morado'
Cc: Katherine Hendricks
Subject: Soaring Helmet Corp. v. Nanal, Inc., Deposition Scheduling

Heather,

Regarding your request for dates that Albert Bootesaz would be available for deposition, I am awaiting final confirmation for the specific dates but can tell you that the possibilities including two days at the end of next week and three days the week of September 13th.

With regard to scheduling depositions of Plaintiff's witnesses, Plaintiff has identified four individuals that we would like to depose: Lou Xu; Jeanne DeMund; Wayne Layman; and Claudia Mallard. All of these individuals appear to be identified as Plaintiff's employees/agents, therefore, please let us know dates each of these witnesses would be available for deposition, as well as their locations.

Plaintiff also identified Joy Loga in response to Interrogatory No. 2. Because she is identified as Plaintiff's sales representative, I assume that arrangements for her deposition should also be made through your office. Therefore, please let us know her availability for deposition as well as where she is located.

Since it appears at least several of the witnesses may be located out of state, we would like to take those out-of-state depositions by telephone pursuant to Fed. R. Civ. P. 30(b)(4). Please let us know if you will stipulate that such out-of-state depositions may be taken by telephone.

Best regards,

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