

Exhibit D

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1 you can answer.
 2 THE WITNESS: What is the question?
 3 BY MS. FOSTER:
 4 Q. Are there directors of Nanal Inc.?
 5 A. What is directors?
 6 Q. Directors and officers of the corporation.
 7 A. Define "directors."
 8 MR. MOKHTARZADEH: Do you know what the term
 9 "director" means?
 10 THE WITNESS: No.
 11 BY MS. FOSTER:
 12 Q. Do you know if Nanal has directors?
 13 A. It doesn't have -- I don't know what director
 14 is if you don't explain what director is.
 15 Q. You've indicated you're president of Nanal?
 16 A. Correct.
 17 Q. As president, are you an officer of the
 18 corporation?
 19 A. Correct.
 20 Q. Are there any other officers of the
 21 corporation?
 22 A. Yes.
 23 Q. Who are the other officers?
 24 A. First name Nahid, N-a-h-i-d, and the last
 25 name is B-o-t-h-s-a-z [sic].

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1 Q. Nahid Botesaz?
 2 A. Yes.
 3 Q. And is Ms. Botesaz a vice president?
 4 Secretary? Treasurer? What would be the office --
 5 A. She is the vice president.
 6 Q. Other than Ms. Botesaz, are there any other
 7 officers of Nanal Inc.?
 8 A. No.
 9 Q. Does Nanal Inc. have corporate meetings?
 10 MR. MOKHTARZADEH: Objection. Vague and
 11 ambiguous.
 12 You can answer if you know.
 13 THE WITNESS: I don't know what you're
 14 talking about.
 15 BY MS. FOSTER:
 16 Q. Does the corporation hold meetings?
 17 A. I have to ask my accountant. He's not here,
 18 so I can't ask him.
 19 Q. Are you, as the president of Nanal, involved
 20 in corporate meetings?
 21 A. With Nahid, yes.
 22 Q. And how often do you meet?
 23 A. Every six months.
 24 Q. Are there notices of those meetings?
 25 A. I don't recollect if there is notice.

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1 Q. When was the last meeting?
 2 A. A couple of months ago.
 3 Q. Is Nahid your sister?
 4 A. Yes.
 5 Q. Does the corporation have shares of stock?
 6 A. I don't know.
 7 MR. MOKHTARZADEH: Objection. Invasion of
 8 privacy. Not calculated to lead to the discovery of
 9 admissible evidence.
 10 To my knowledge, it has nothing to do with
 11 any of the issues in this case whether or not there are
 12 shares issued or how shares are issued. Again, I don't
 13 see how that's relevant or can possibly be used to lead
 14 to discovery of admissible evidence in this action. If
 15 there's an offer of proof, I'll reconsider; otherwise,
 16 I'll instruct him not to answer.
 17 MS. FOSTER: Mr. Mokhtarzadeh, this
 18 corporation is a defendant in a lawsuit. We're
 19 entitled to investigate the corporation. We're
 20 certainly not invading any privacy issues here.
 21 Whether the corporation is an S corporation or C
 22 corporation is a valid question. Whether there are
 23 officers, directors, annual meetings, assets,
 24 capitalization of the corporation are certainly valid
 25 questions, and they are relevant to this lawsuit.

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1 So I think that we're going to move a lot
 2 faster if we can just get through these corporation
 3 questions, which are really just very basic,
 4 introductory questions. We, as you know, are protected
 5 by a confidentiality order in this case which has been
 6 entered with the court, so none of this information
 7 will go beyond the lawsuit. There are no privacy
 8 concerns at issue here.
 9 MR. MOKHTARZADEH: Again, while I agree there
 10 are no privacy concern issues, and furthermore, while I
 11 agree with you that with respect to the confidentiality
 12 order, issue of confidentiality would be covered, I'm
 13 looking at your notice of deposition for this hearing -
 14 - for this deposition regarding topics of issues in
 15 terms of what material will be covered in deposition.
 16 I don't see anything in the topics, anything related to
 17 the corporate structure or the shareholders, et cetera.
 18 Furthermore, based on my recollection with
 19 respect to the claims raised in the complaint, I don't
 20 believe alter ego liability has been an issue raised in
 21 the complaint either.
 22 So, to my knowledge, there is, A, no issue
 23 from corporate -- from the complaint point of view,
 24 there is no notice with respect to any such area being
 25 covered in the notice of deposition that I can see.