

Exhibit D

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Re: *Patrick C. Desmond, et. al. v. NN Ga., Inc., et. al.*
State Court of DeKalb County, State of Georgia
Civil Action File No. 10A28641-2

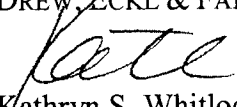
Counselors:

We have received Plaintiff's Motion for Sanctions, together with Brief in Support Thereof. We were somewhat surprised by the filing of the Motion since, among other things, we have never been contacted in the three months since the deposition of Mary Rieser regarding the issues raised in the Motion. See, State Court Rule 6.4. We also disagree with the substance of the Motion.

Nevertheless, we are willing to work with you to resolve the issues that we can. What do you envision in a "subsequent deposition of Mary Rieser"? Also, which rules of professional conduct and Georgia law do you contend that we did not abide by in the first deposition? None is specified in Plaintiffs' brief.

I look forward to hearing from you soon.

Very truly yours,
DREW ECKL & FARNHAM, LLP


Kathryn S. Whitlock

KSW:crp

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