

# EXHIBIT D

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**From:** Peterson, Joseph <joseph.peterson@dlapiper.com>  
**Sent:** Thursday, April 23, 2020 12:58 PM  
**To:** Walt Tollison  
**Cc:** Dagostino, Alida; Lauren Price; Stacy Nixon  
**Subject:** RE: Future Income Payments

Dear Walt:

On behalf of the Receiver, you requested certain client file information related to those former DLA clients whom the Court has placed within the Receiver's authority. The Receiver's authority is derived from the March 3, 2020 Court Order, which does not provide the Receiver with privilege waiver authority over any of the entities not defined as "Defendants." See March 3, 2020 Amended Order of Appointment at para. 6 (docket no. 41). We have provided you with the requested ledger summary and a set of invoices for the matter that DLA handled for those named Defendants. We have satisfied our ethical obligations. The additional information you seek is client confidential data for Firm clients who do not fall into the scope of the Receiver's authority. This is not a discovery issue; this is a client confidentiality issue. We are not obligated to justify privilege assertions or provide a privilege log. The Receiver is simply not entitled to receive confidential client data related to entities that the Receiver's authority does not encompass.

If the Court ultimately amends the Order to expand the Receiver's authority over these other entities, please let us know and we'll be happy to provide client file information at that time.

Regards,

**Joseph Peterson**

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