

Exhibit D

Antonio Valiente

From: Miller, Melanie <MMiller@cozen.com>
Sent: Thursday, January 7, 2016 2:56 PM
To: Antonio Valiente
Cc: Marco Gonzalez; guillermo.mena@me.com; Guillermo Mena; riverasotor@ballardspahr.com; Miller, Melanie; Miller, Camille
Subject: RE: Deposition of Dr. R. Arora (ABIM v. Dr. Jaime Salas Rushford)
Sensitivity: Private

Mr. Valiente:

I confirm the date and time of the deposition but stand by Dr. Arora's previous written objections to the document subpoena as well as my prior meet and confer conference and communications with your local counsel.

Melanie



Melanie A. Miller
Member, Intellectual Property Department | Cozen O'Connor
One Liberty Place | 1650 Market Street, Suite 2800 | Philadelphia, PA 19103
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From: Antonio Valiente [mailto:avaliente@msglawpr.com]
Sent: Thursday, January 7, 2016 1:24 PM
To: Miller, Melanie
Cc: Marco Gonzalez; guillermo.mena@me.com; Guillermo Mena; riverasotor@ballardspahr.com
Subject: RE: Deposition of Dr. R. Arora (ABIM v. Dr. Jaime Salas Rushford)
Sensitivity: Private

Dear Miss Miller,

Please accept this communication as our confirmation for the date and time of the taking of deposition of your client, Dr. Rajender Arora. The same will take place on Thursday, January 21 beginning at 12PM, as your client requested. Except for the aforementioned change in date and time, all other aspects of the subpoena and any attachment remain in effect.

As mentioned below, to this date, our PHV application remains pending resolution from the Honorable Court. However, should the deposition date arrive and the same still be pending, local counsel Mr. Marco Gonzalez would carry out this discovery exercise.

As before, I thank you for your assistance in completing this discovery of this case filed by ABIM against Dr. Salas Rushford.

Feel free to contact me for any additional matter on this regard.

Sincerely,

Antonio Valiente
Cel. 787-567-1234
Tel. 787-620-5300
Fax 787-620-5305

From: Antonio Valiente
Sent: Thursday, December 3, 2015 6:10 PM
To: 'mmiller@cozen.com' <mmiller@cozen.com>
Cc: 'Marco Gonzalez' <mgonzalez@ndslaw.com>; 'guillermo.mena@me.com' <guillermo.mena@me.com>; 'Guillermo Mena' <guillermo75@gmail.com>; 'riverasotor@ballardspahr.com' <riverasotor@ballardspahr.com>
Subject: Deposition of Dr. R. Arora (ABIM v. Dr. Jaime Salas Rushford)
Sensitivity: Private

Dear Miss. Miller,

Thanks for the time you afforded Mr. Guillermo Mena & I to discuss the possibility of rescheduling the deposition of Dr. Rajender Arora. As I advanced to your good self, I am counsel for Dr. Jaime Salas-Rushford and my request for admittance Pro Hac Vice before the USDC - DNJ has been filed and is pending approval from the Court. Mr. Mena is PHV counsel for Dr. Salas along with local counsel, Mr. Marco Gonzalez.

Yesterday, we held a status conference with the Honorable Magistrate Judge for this case. As part of the items discussed was the extension granted to complete discovery until the end of February 2016. Also, during this conference Mr. Roberto Rivera advised his intent to oppose our PHV application. The deadline for that currently is 12/07. In consideration of the aforementioned, the extension of discovery and my client's interest of my participation in all depositions, in conjunction that on the current date of 12/17 my wife is scheduled to have an ambulatory surgery, is why Mr. Mena and I contacted to you to secure available alternate dates for Dr. Arora's deposition sometime after January 6, 2016 (Holidays in PR extend until after Three Kings Day).

As good faith showing, in the understanding that the subpoena that was issued for Dr. Arora's deposition was for Newark, NJ, if we reschedule we would attempt to accommodate any reasonable request you may present.

I thank you in advance for your consideration. Because of time constraint, I will also appreciate any quick response on behalf of your client.

Sincerely,
Antonio Valiente
Tel. 787-620-5300
Fax 787-620-5305

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