

**From:** [Adam S. Huhta](#)  
**To:** ["Peter Kohlhepp"](#)  
**Cc:** ["Gregory M. Erickson"](#); ["Bill Mohrman"](#); [gerdts@blackhole.com](mailto:gerdts@blackhole.com)  
**Subject:** Zayed v. Buysse - Second Supplemental Answers and Objections to Receiver's Interrogatories  
**Date:** Monday, October 24, 2011 4:00:20 PM  
**Attachments:** [2011-10-20 2nd Supplemental Responses to Receiver's First Interrogatories to Investor Respondent Dot Anderson.pdf](#)  
[2011-10-20 Anderson Verification.pdf](#)

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Mr. Kohlhepp:

Attached are Mrs. Anderson's Second Supplemental Answers and Objections to the Receiver's Interrogatories, and Mrs. Anderson's verification, supplementing Interrogatory Nos. 2, 3, 8, 10, 11, 12, 13, and 14, which I received from her today.

I note that your October 7 meet and confer letter asked Mrs. Anderson to supplement her responses to Interrogatory Nos. 8 and 10, and that during our Friday, October 14 meet and confer discussion I indicated I would supplement the responses to each of those interrogatories. These supplemental responses address each of those interrogatories.

On the afternoon of Monday, October 17 - the afternoon of the day that motions related to discovery issues had to be filed - you called and asked me for the first time to supplement Mrs. Anderson's responses to Interrogatory Nos. 10-14 and identify documents upon which Mrs. Anderson relies for various issues. I note the timing of your request for supplementation given your claim on Friday, October 14 that that my October 12 meet and confer letter was untimely, and that I "waited until the last hour" to raise the numerous deficiencies in the Receiver's discovery responses.

I trust these supplemental responses addresses the issues in the Receiver's motion to compel, which you indicate was filed as a placeholder, and that you will withdraw the motion. If not, please let me know.

Regards,  
Adam Huhta

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EXHIBIT D