

**EXHIBIT D**

## **RESPONSES FROM DEFENDANT OSKOUIE**

### **REQUEST NO. 9**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which any of Defendants Oksouie [sic], Osko, or Platinum processed any money or benefit arising out of their respective businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

### **Response No. 9:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

### **REQUEST NO. 14**

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service provider, including any account that You share, draw from, or otherwise have access to but do not control.

**Response No. 14:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

## **RESPONSES FROM DEFENDANT PLATINUM**

### **REQUEST NO. 6**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which You processed any money or benefit arising out of Your businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

### **Response No. 6:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

### **REQUEST NO. 9**

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service

provider, including any account that You share, draw from, or otherwise have access to but do not control.

**Response No. 9:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

## **RESPONSES FROM DEFENDANT OSKO**

### **REQUEST NO. 4**

All documents and communications concerning the management, administration, finances, financial record keeping, cash flow, or the manner in which You processed any money or benefit arising out of Your businesses, including but not limited to <FFLTrust.com>, <InfiniteConversions.com>, and <TheUnitutor.com>, during each of the past four (4) years, including documents sufficient to show gross sales, net profit, advertising expenditures, and online traffic to each website for each year.

### **Response No. 4:**

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad (websites other than <FFLTrust.com> are not at issue), unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent or prior, more specific requests.

### **REQUEST NO. 6**

Documents and communications sufficient to identify every account You currently have or have had access to during the past four (4) years at any bank or other financial service

provider, including any account that You share, draw from, or otherwise have access to but do not control.

**Response No. 6:**

Defendant specifically objects to this Request on the grounds that it is wholly overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.