

Exhibit D



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October 4, 2022

Via Email and U.S. Mail

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*Re: Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.
Rowland & Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.*

Dear Counsel,

In our 9/29/22 correspondence, we asked whether you will agree to produce Phillip Brumley, Gary Breaux, Gene Smalley, and Allen Shuster for depositions in New York. As I understand it, WTPA has agreed to produce Mr. Brumley for a deposition so we will need to find a date for that. On 9/28/22 Chris Sweeney stated that counsel would need to consult with the other three gentlemen “and evaluate any notices addressed to them individually to assess next steps.” We provided draft notices to you on 9/29/22 and are again asking whether you will produce Gary Breaux, Gene Smalley, and Allen Shuster for depositions? Alternatively, if you are not willing to make these gentlemen available, please state the reason so that we may evaluate your position.

October 4, 2022

Page 2

With regard to Plaintiffs' depositions, please let us know how you wish to proceed so that we can make adequate arrangements.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

A handwritten signature in blue ink, appearing to read "Ryan R. Shaffer", is written over the printed name. The signature is stylized with a large initial "R" and a long horizontal stroke.

Ryan R. Shaffer

Cc: Bruce Mapley, Sr., via email and U.S. Mail