

EXHIBIT D

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July 26, 2018

Via Electronic Mail

Douglas H. Amster, Esq.
LEWIS BRISBOIS BISGAARD & SMITH LLP
One Riverfront Plaza, Suite 800
Newark, New Jersey 07102

Re: Jerry Cadigan, et. al. v. Liberty Helicopters, Inc., et. al.

Dear Mr. Amster,

We are in receipt of defendant Liberty's jurisdictional Demand for Discovery and Inspection dated July 24, 2018. New York's Civil Practice Law and Rules § 3214 provides, in pertinent part, that "service of a motion under rule 3211 . . . "stays disclosure until determination of the motion unless the court orders otherwise." Because Defendant Apical's Motion to Dismiss pursuant to CPLR § 3211(a)(8) is pending, the discovery you have served is automatically stayed.

Very truly yours,



Anthony W. Eckert III

AWE/bm

cc: Gary C. Robb, Esq.
Matthew F. Schwartz, Esq.
Jonathan M. Stern, Esq.
David J. Harrington, Esq.