

Exhibit D

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JERRY CADIGAN, and NANCY CATON
CADIGAN, as the Proposed Administrators of
the Estate of TREVOR NORRIS CADIGAN,
deceased,

Plaintiffs,

-against-

LIBERTY HELICOPTERS, INC., a New York
Corporation; NYONAIR, LLC, a New Jersey
Limited Liability Company; MERIDIAN
CONSULTING I CORPORATION, INC., a
Delaware Corporation; RICHARD ZEMKE
VANCE, a Connecticut resident; AIRBUS
HELICOPTERS, S.A.S., a French Corporation;
AIRBUS HELICOPTERS, INC.; a Delaware
Corporation; and APICAL INDUSTRIES, INC.
d/b/a DART AEROSPACE, a California
Corporation;

Defendants.

INDEX NO.: 152286/2018

**COMMISSION TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

THE PEOPLE OF THE STATE OF NEW YORK

TO: Katherine Ayre, Esq.
Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide St W
Toronto, ON, Canada M5H 4E3

KNOW YOU, that we, with full faith in your prudence and competence, have appointed
you Commissioner, and by these presents do authorize you to issue and direct the service of a
subpoena duces tecum upon:

Document Custodian of EuroTec Canada, Limited
12 Innovation Drive Unit W
Dundas, Ontario L9H 7P3 Canada

EuroTec Canada, Limited as a non-party to the above-entitled action, pending in our Supreme Court of the State of New York, New York County, between JERRY CADIGAN, and NANCY CATON CADIGAN, as the Proposed Administrators of the Estate of TREVOR NORRIS CADIGAN, deceased, as plaintiffs, against LIBERTY HELICOPTERS, INC., a New York Corporation; NYONAIR, LLC, a New Jersey Limited Liability Company; MERIDIAN CONSULTING I CORPORATION, INC., a Delaware Corporation; RICHARD ZEMKE VANCE, a Connecticut resident; AIRBUS HELICOPTERS, S.A.S., a French Corporation; AIRBUS HELICOPTERS, INC.; a Delaware Corporation; and APICAL INDUSTRIES, INC. d/b/a DART AEROSPACE, a California Corporation, as the Defendants, under oath and upon oral examination.

FURTHER, WE COMMAND YOU, that at a certain time and place to be appointed by the Superior Court of Ontario, you issue and direct the service of a subpoena duces tecum to produce documents, as set forth herein to counsel for the Defendants, LIBERTY HELICOPTERS, INC; MERIDIAN CONSULTING I CORPORATION, INC.; and RICHARD ZEMKE VANCE (collectively, "Liberty Helicopters") unless necessary to distinguish) under oath or on affirmation touching upon the matters in controversy in the above-referenced action and that the transcript of the depositions be reduced to writing, subscribed to by the witnesses, and certified to be correct, and attached to this Commission with any exhibits, and that you return the same to the Clerk of the Supreme Court, New York County, by certified or registered mail with all convenient speed.

WITNESS Hon. JAMES E. d'AUGUSTE, J.S.C, one of the Justices of said Court, at Part 55,
_____ of _____, 2018

By the Court:

Let the within Commission be returned through the Post Office by registered or certified mail, directed to Clerk of the Supreme Court, New York County, 60 Centre Street, New York, New York 10007 with copies to Lewis Brisbois Bisgaard & Smith, LLP counsel for Liberty Helicopters., 77 Water Street, 21st Floor, New York, New York 10005.

Dated:

New York, New York

HON. JAMES E. d'AUGUSTE