8-27-20

Exhibit D

Rule 45 (E) Undo financial burden, would like my Attorney Expenses paid by Plaintiff.

Plaintiff, has received documents and answers to previous question request. This took untold hours and hardship. It is now harassment as I have previous told him my health is somewhat fragile as my kidneys function at about 21 GFR and because of this Virus I am in a high risk group. He doesn't care.

He has made no attempt in letting me gain representation, and consulting with counsel.

I am just one person against a Law firm with unlimited funding.

Roger Hamblin