

# **EXHIBIT D**

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November 8, 2007

VIA FACSIMILE / EMAIL / U.S. MAIL

Gailon Arthur Joy  
P.O. Box 1425  
Sterling, MA 01564-1425

**Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.  
Gailon Arthur Joy and Robert Pickle  
Court Docket No. 07-40098-FDS  
Our File No. 24,681-D-002**

Dear Mr. Joy:

I am in receipt of your voice mail and e-mail messages of November 8, 2007. Unfortunately, the timing of your response to my correspondence (coming less than 24 hours from the time proposed for the imaging project) has left the computer experts insufficient time to prepare their equipment or arrange travel to the proposed imaging site to do the project Friday morning at 9:00 a.m. We are working diligently to make this process as least intrusive and inconvenient as possible. However, here are some issues and options.

First, the only equipment that can be "imaged" by the experts is the five computers with Windows or XP operating systems. None of the other equipment need be produced.

Second, the computer experts understandably do not want to risk performing the imaging at your virally-contaminated home. They have requested either that you produce the 5 computers at a healthy, neutral location (such as a court-house or hotel conference room) in your area, or that you Federal Express that equipment to their offices. Their preference would be that the equipment be FedEx'd, since the 3 inoperable machines will require significantly more equipment than they would otherwise carry into the field and will require more time to image than operable units. As with the cost of the imaging itself, Plaintiffs will bear the cost of the FedEx shipping and appropriate shipping insurance. Shipping of the monitors and keyboards is not required and we would expect the units to be shipped by the end of the day tomorrow (Friday, Nov. 9).

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Third, if you will not agree to simply ship the computers, please confirm whether you can make the five computers available on Monday, November 12, 2007. Please also provide me with a short list of suggested neutral sites (including addresses) where you would be willing to produce the machines for imaging. If you are not healthy enough to transport the machines to the neutral location, Plaintiff will arrange for a courier or delivery service to do so.

Fourth, the sealing of the imaged data will be included in the expert's imaging protocol. First, the bit data image will be made and temporarily stored on the imaging hardware. Because the expensive imaging hardware is used on all the company's imaging projects, the bit data image will then be transferred from the imaging hardware to one of the company's secure, high-capacity storage servers. The image will then be algorithmically verified to ensure the image is valid, then it will be encrypted and a back-up copy will be made. The encrypted data (original and back-up) will then be secured so that it can only be accessed by a single individual at the company. That individual will then sign an agreement, to be witnessed by both parties, to seal and not access the data (or allow anyone else to access the data) until otherwise ordered by the Court.

Finally, once you have informed me of whether you prefer to ship the equipment or produce it on Monday, November 12, I will provide the name of the technician who will be performing the imaging. If the units are not shipped, that technician will provide a business card as identification at the time of imaging.

I look forward to hearing from you concerning these matters.

Sincerely,



Handwritten signature of Jerrie M. Hayes in cursive script.

Jerrie M. Hayes

JMH/cg

cc: Laird Heal