

EXHIBIT D

From: [Lauren E Martin](#)
To: ["Morton, Phillip"](#); ["Stameshkin, Liz"](#); ["Jessica Phillips"](#); ["Annelise Corriveau"](#); ["France Svitovski"](#); ["Angela L. Dunning"](#); ["Karen Dunn"](#); ["Ghajar, Bobby A."](#); ["Weinstein, Mark"](#); ["Hartnett, Kathleen"](#)
Cc: AI_Copyright_Team@fnf.law
Subject: Follow-up re: supplemental discovery responses
Date: Friday, July 24, 2026 3:33:00 PM

Phil-

Thank you for taking the time to meet with us yesterday and for sharing the preliminary information regarding the training data.

As we understand it, Meta will supplement its responses to Interrogatory Nos. 1, 2, 3, 4 and 5 next week along the lines we discussed for the Chicken Soup and Cambronne Plaintiffs, with the exception of certain works by Jane Adams and Lisa Barretta. For those two authors, we will work to provide you with the text of their works in the coming days. We understand and appreciate that your supplement responsive to Interrogatory Nos. 4 and 5 will endeavor to provide more specificity about where to look in the production files than the preliminary information contained. As discussed, we understand that due to the volume, Cognella is taking longer. To try to help speed things along, we are working to pull together and will share any information we are able to provide—on an informal, non-discoverable basis, as you did with the preliminary information—about which works we believe were in which shadow library. If possible (and we do not know if it will be possible) we will include the torrent file name. We'll also check whether there are any URLs or domains we can provide for Cognella and Chicken Soup to facilitate more efficient searches of SpiderMate.

We didn't have sufficient time on our call to discuss your plan for supplementing Interrogatory Nos. 6-8. We anticipate that parts of No. 7 will be addressed by the responses to Nos. 1-5, but would appreciate a high-level understanding of how and when you plan to supplement Nos. 6-8 so that we can identify any concerns with the planned approach for immediate discussion. If that is easiest to explain in a responsive email rather than another call, please let us know.

We are also happy to speak again. Thank you for your help and work to keep things moving.

Elle

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 Counsel



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