

**EXHIBIT D**



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May 16, 2016

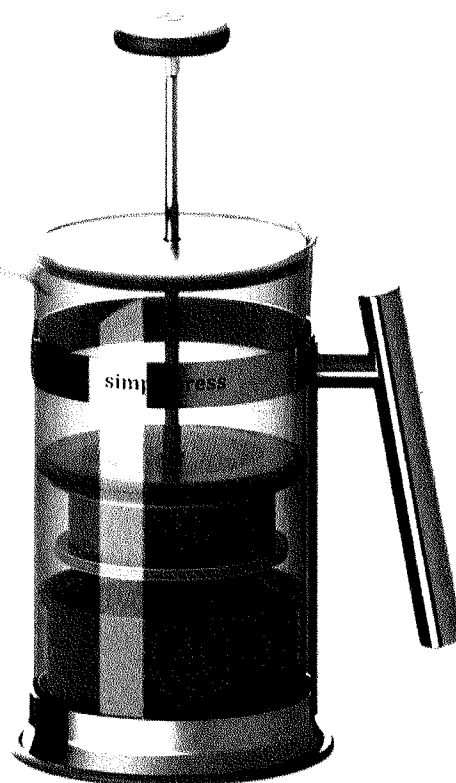
**VIA ELECTRONIC MAIL TO: [jenni.morse@simplipresscoffee.com](mailto:jenni.morse@simplipresscoffee.com)**

Jennifer Morse  
SimpliPress  
Hermosa Beach, CA  
USA 90254

**Re: Espro U.S. Patent No. 8,770,097**

Dear Ms. Morse:

We are writing further to your electronic mail correspondence with Bruce Constantine of Espro, Inc. of October 30, 2015, at which time Mr. Constantine cautioned you to be careful to not violate any issued patents of Espro, Inc. We have acquired the following image of what you purport to be your coffee press product from your website:



 DAY PITNEY LLP

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We enclose Espro's U.S. Patent No. 8,770,097, issued July 8, 2014. We are disappointed to see that your product apparently infringes at least Claim 5 of this patent. Espro has a second allowed patent application, and a third that is in the process of being allowed, that also appear to be infringed by this design. We will send copies of these patents to your attention as soon as they are issued.

If you do not believe that your product infringes, we earnestly request that you provide us for the basis of your non-infringement. If we do not receive such an explanation, we will be forced to conclude that you are infringing, and Espro, Inc. formally demands that you cease any and all such infringement. It is our further view that any continued infringement is willful, exposing you to ordinary and enhanced damages and attorney fees under 35 U.S.C. §285 in an infringement action. And, Espro shall pursue all legal remedies at its disposal to stop this infringement.

We look forward to your response.

Very truly yours,



Brian R. Pollack