

# EXHIBIT D

**DECLARATION OF LAURA E. BIELINSKI, ESQ.**

I, Laura Bielinski, hereby declare as follows:

1. I am an attorney with the law firm of Brownstein Hyatt Farber Schreck, LLP, Defendant/Counterclaimant Liberty Media Holdings, LLC's ("Liberty") counsel in this case. I have personal knowledge of the facts set forth herein, and if called upon to do so, am competent to testify thereto.

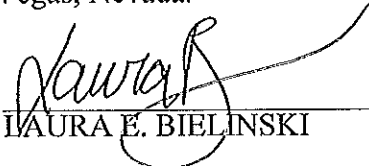
2. The parties held an early case conference on May 2, 2013, and have been actively negotiating to enter a stipulated protective order to protect the confidential and privileged matter at issue in this litigation.

3. Liberty's counterclaim in this case includes a request for damages in the form of attorneys' fees expended to rectify RLG's blatant misrepresentations to the District Court in *Liberty Media Holdings, LLC v. FF Magnat* ("Oron Case"), currently on appeal from the United States District Court for the District of Nevada ("District Court"), Case No. 2:11-cv-00637-RLH-GWF, regarding the fees Liberty incurred in that case. Because of RLG's actions, Liberty was required to expend significant resources to analyze the issues associated with RLG's misrepresentations and present the truth to the District Court and Ninth Circuit Court of Appeals. Liberty has been damaged in an amount in excess of \$50,000 in this regard alone.

4. RLG raised its desire to arbitrate this matter for the first time through its Opposition, despite the fact that the parties proceeded through briefing a motion to dismiss, conducted an early case conference and have been negotiating a stipulated protective order for approval by the District Court.

5. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 30<sup>th</sup> day of May, 2013, at Las Vegas, Nevada.

  
LAURA E. BIELINSKI

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