

Exhibit D

Document Requests

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

AIRFASTTICKETS, INC.,

Debtor.

Chapter 11

Case No. 15-11951 (SHL)

FAREPORTAL'S RULE 2004 DOCUMENT REQUESTS

Fareportal Inc. ("Fareportal"), by and through its undersigned counsel, submits the following request for production of documents pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedures:

DEFINITIONS

1. Wherever appropriate in this request, the singular form of any word includes the plural and vice versa, and the masculine form of a word shall be interpreted as feminine and vice versa.

2. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these requests all responses that might otherwise be construed to be outside their scope.

3. The terms "all," "any," and "each" shall be construed as encompassing any and all.

4. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

5. "Concerning" means relating to, referring to, describing, evidencing or constituting.

6. "Documents" is defined to be synonymous in meaning and equal in scope to the usage of the term "documents or electronically stored information" in Fed. R. Civ. P.

34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

7. “Identify,” when referring to a person, shall mean to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

8. “Identify,” when referring to documents, means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d).

9. “Information” shall be expansively construed and include, without limitation, facts, data, opinion, images, impressions, concepts and formulae.

10. “Person” means any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

11. “Relate to” or “relating to” any given subject shall mean any information or any document or documents that comprise, constitute, contain, embody, evidence, identify, reflect, state, refer to, deal with or are in any way pertinent to that subject, including but not limited to, documents concerning the preparation of other documents.

12. “Thing(s)” means any tangible object encompassed within the most inclusive definition of this term in any decision from a court in this or any other controlling jurisdiction, including but not limited to any tangible things that constitute or contain matters within the scope of Rule 26(b) of the Federal Rules of Civil Procedure.

13. “You” and “Your” means or refers to the Travana, Inc. and its directors, officers, employees, agents, independent contractors, subcontractors, attorneys, representatives, successors and assigns.

14. “Airfasttickets” means Airfasttickets, Inc. and its directors, officers, employees, agents, independent contractors, subcontractors, attorneys, representatives, successors and assigns.

15. “AirTourist” means AirTourist, Inc. and its directors, officers, employees, agents, independent contractors, subcontractors, attorneys, representatives, successors and assigns.

16. “Sale Agreement” means the October 23, 2015 Purchase and Sale Agreement between Airfasttickets, Inc. and AirTourist, Inc.

17. “Transferred Source Code” means the source code and rights to source code identified in Paragraph 2 of Exhibit A to the Sale Agreement, as well as any source code housed on the servers identified in Paragraph 3 of Exhibit A to the Sale Agreement.

18. “Transferred Software” means all software (as defined in Section 1.1.6 of the Sale Agreement) set forth on Exhibit A to the Sale Agreement.

INSTRUCTIONS

1. You shall produce all Documents, Things, and Information responsive to these requests that are in your possession, custody, or control, including all documents and things in the possession, custody, or control of your past or present agents, employees, companies, licensees, representatives, investigators, or attorneys.

2. Documents and Things shall be produced with sufficient information to identify the files or repositories in which such responsive Documents and Things are maintained in the

normal course of business, including, for example, an index, key, code or other means of ascertaining the source of the produced Documents and Things.

3. All Documents that are produced in electronic format must be produced in native format. All Documents that are produced in electronic format should also include: (i) Group 4 “tiff” images and IPRO-ready LFP and OPT files; (ii) a Concordance delimited import file with boundaries; (iii) full text OCR, with OCR text files provided on a document level; and (iv) all meta data fields associated with each electronic document. Fareportal also requests that all spreadsheets created in Microsoft Excel or similar spreadsheet program be produced in their native format. Fareportal reserves the right to request that other Documents be produced in their native format if necessary. The following metadata fields are also to be produced with all documents produced in electronic format:

Field Name	Description
BEGDOC	The beginning bates number for a document. This represents the first page of any given document.
ENDDOC	
BEGATTACH	The beginning bates number for a family of documents. This represents the first page in each family (parent-child) relationship.
ENDATTACH	
APPNAME	Name of the application that opens the native file.
ATTACHCOUNT	The number of attachments any given item possesses.
ATTACHNAMES	List of files attached to an email.
ATTACHRANGE	The DOCID range for the family of items.
CUSTODIAN	Custodian name.
FROM	The name and email address of the individual who wrote the email.

TO	The complete list of all names and emails of all individuals contained in the “To” field of the email.
CC	The complete list of all names and emails of all individuals contained in the “CC” field of the email.
BCC	The complete list of all names and emails of all individuals contained in the “BCC” field of the email.
AUTHOR	The application recorded “author” field of a document.
SUBJECT	The subject of the email.
TITLE	The application recorded “title” field of a document.
SORTDATE	First use SENTDATE, then MODIFIEDDATE, then CREATEDATE of the parent item. Populated for all family members.
SORTTIME	First use SENTTIME, then MODIFIEDTIME, then CREATETIME of the parent item. Populated for all family members.
SENTDATE	The date captured by the mailstore as to when the email was sent.
SENTTIME	The time captured by the mailstore as to when the email was sent.
RECEIVEDDATE	The date captured by the mailstore as to when the email was received.
RECEIVEDTIME	The time captured by the mailstore as to when the email was received.
CALSTARTDATE	The application recorded date that a calendar item was scheduled to start.
CALSTARTTIME	The application recorded time that a calendar item was scheduled to start.
CALENDDATE	The application recorded date that a calendar item was scheduled to end.
CALENDTIME	The application recorded time that a calendar item was scheduled to end.
CREATEDATE	The application recorded date the file was generated.
CREATETIME	The application recorded time the file was generated.
MODIFIEDDATE	The application recorded date the file was last modified.
MODIFIEDTIME	The application recorded time the file was last modified.
PRINTDATE	The application recorded date the file was last printed.
PRINTTIME	The application recorded time the file was last printed.

FILETYPE	Description of type of document, i.e. Email, E-Doc.
FILEEXT	The extension of the file.
FILENAME	The name of the file.
FILEPATH	The path to the file, including pst storename and folders if item is from a PST.
FILESIZE	The size of any given item in kilobytes. This field includes parent emails as well.
MAILFOLDER	The name of the folder path within the parent mail store that contains the email.
MD5HASH	MD5 Hash of efile, or MD5 Hash of dedupe fields for email
MSGCLASS	Outlook Email - Mail item class (Note, Report, Meeting, etc.)
INTMSGID	The unique Internet message ID of an email. This is assigned in the email header and is not specific to the email application used.
ENTRYID	The unique mail identifier assigned by the mail application (pst or nsf) for every mail item.
HIDDEN_CONTENT	Yes/No field. Populate with YES for any documents that contain comments, speaker notes, track changes, etc.
NATIVEFILE	The relative path linking the document.
FULLTEXT	Relativity path linking the text file.

4. Whenever you are asked to produce Information or a Document that is deemed by you to be properly withheld from production for any reason, you shall provide a privilege log that will include listing such Information or Document by title or subject heading, date, author, person who signed the document, addressee and all recipients, and a statement of the grounds(s) asserted for withholding the document, including attorney-client privilege or work product privilege.

5. If you withhold any Information or any Document on the claim of attorney/client or work product privilege, identify the privilege claimed as well as each Communication

(including oral Communications) and Document for which such privilege is claimed, together with the following information with respect to each such Communication and Document:

- a. Date;
- b. Sender;
- c. Addressee;
- d. Subject;
- e. The basis on which the privilege is claimed; and
- f. The names of persons to whom copies of any part of the Document were furnished, together with an identification of their employee and their job titles.

6. If you maintain that any Document or Thing requested by Fareportal has been destroyed, set forth the contents of the Document or Thing the date of its destruction and the name of the person who authorized its destruction.

7. Where an objection is made to a request, state all grounds upon which your objection is based.

8. The Documents, Communications, Things, and Information produced pursuant to this request are to be segregated and identified by the number of the request below to which are responsive, or are to be produced as they are maintained in the ordinary course of business.

9. Unless otherwise specified, these requests seek information and documents prepared during, or related to, the period of time from January 1, 2012 through the date of your response hereto, without regard to what date the information came into your possession.

DOCUMENT REQUESTS

1. All documents and communications relating to Your acquisition, creation or development of the Transferred Source Code.

2. All documents and communications relating to Your acquisition, creation or development of the Transferred Software.
3. All communications between You and Airfasttickets regarding the Transferred Source Code.
4. All communications between You and Airfasttickets regarding the Transferred Software.
5. All communications between You and AirTourist regarding the Transferred Source Code.
6. All communications between You and AirTourist regarding the Transferred Software.
7. All documents and communications concerning the sale of the Transferred Source Code.
8. All documents and communications concerning the sale of the Transferred Software.
9. The Transferred Source Code.
10. The Transferred Software.