

EXHIBIT D

Candescent Law Group

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January 21, 2022

VIA EMAIL

Peter Mazur
Devlin Law Firm LLC
1526 Gilpin Ave.
Wilmington, DE 19806
PMazur@devlinlawfirm.com

Re: Ocean Semiconductor Litigation Matters
Purported Subpoenas to United Microelectronics Corporation

Dear Peter:

I write in response to your January 19, 2022 email to me. Your email attached purported FedEx delivery receipts and subpoenas to United Microelectronics Corporation (“UMC”). The delivery receipts appear to indicate that Ocean attempted to serve these subpoenas by mailing them via FedEx directly from your firm to UMC’s offices in Taipei, Taiwan.

Your attempted service of these subpoenas by FedEx is improper and inconsistent with the Federal Rules of Civil Procedure and applicable Taiwan laws. Moreover, I am not authorized to accept service of subpoenas on behalf of UMC, and therefore your email to me attaching the subpoenas does not constitute effective service. Aside from the lack of effective service, UMC is outside the subpoena power of United States courts. Accordingly, UMC is under no obligation to respond to these subpoenas, and any response would be entirely voluntary.

As I indicated in my January 12, 2022 email to you, UMC would be willing to discuss producing documents responsive to certain document requests in the subpoenas if Ocean is willing to significantly narrow the scope of its requests. Please let me know if Ocean would like to discuss this matter. I will generally be available either Monday or Tuesday next week.

Sincerely,



Robert G. Litts