

EXHIBIT D

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ESIP Series 1, LLC and
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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

<p>ESIP SERIES 1, LLC, a Utah Limited Liability Company, and ESIP SERIES 2, LLC, a Utah Limited Liability Company,</p> <p>Plaintiffs,</p> <p>v.</p> <p>DOTERRA INTERNATIONAL, LLC, a Utah Limited Liability Company, PUZHEN LIFE USA, LLC, a New York Limited Liability Company, PUZHEN, LLC, a New York Limited Liability Company, and DOE COMPANIES 1-10,</p> <p>Defendants.</p>	<p>Case No. 2:16-CV-01011-RJS</p> <p>COMPLAINT</p> <p>Judge Robert J. Shelby</p>
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Plaintiff, ESIP Series 1, LLC and Plaintiff, ESIP Series 2, LLC (hereinafter collectively “ESIP”), hereby files this Complaint against Defendants, doTERRA International, LLC (hereinafter “doTERRA”), Puzhen Life USA, LLC (hereinafter “Puzhen Life”) and Puzhen, LLC (hereinafter “Puzhen”), and Doe Companies 1-10 (hereinafter “Doe Companies”) (hereinafter collectively “Defendants”), and alleges as follows: