

EXHIBIT 2



Michael A. Sherman

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August 19, 2019

VIA E-MAIL AND U.S. MAIL

dhadden@fenwick.com

David J. Hadden
Fenwick & West LLP
801 California Street
Mountain View, CA 94041

**Re: *In re PersonalWeb Technologies, LLC, et al. Patent Litigation,
Nos. 18-md-02834 (N.D. Cal.)***

Dear David:

PersonalWeb Technologies, LLC (“PersonalWeb”) proposes stipulating to judgment of non-infringement on its counterclaims in case no. 5:18-cv-00767-BLF (“Case”) as respects all claims for patent infringement asserted against AWS’ “CloudFront” product (and while not presently part of the case in the trial court, AWS’ S3 product), while preserving all rights to appeal as enumerated in the penultimate sentence of this paragraph; so too, PersonalWeb proposes stipulating to judgment of non-infringement on all U.S. Patent No. 7,945,544 patent claims asserted against Twitch and all other website operators in the cases against website operators that are within the MDL (and while not presently part of the case in the trial court, claims of infringement against Twitch and other website operators’ use of AWS’ S3 products). As part of that same stipulation, we propose that Amazon.com, Inc. and Amazon Web Services, Inc. dismiss their complaint in the Case without prejudice to its refile as future circumstances might dictate as alluded below. PersonalWeb makes this proposal without intending in any way to affect the ongoing consideration of the appeal it filed bearing the case name “In re: PersonalWeb Technologies LLC,” U.S. Court of Appeals for the Federal Circuit case no. 19-1918 (“Appeal”), and in no way should any of us argue that these proposed stipulations of judgment of non-infringement impact the Appeal or be relied upon in the Appeal in any way (*e.g.*, such proposed stipulations should not in any way affect the Kessler arguments at issue in the Appeal, or the other issues we have previously identified in our Notice of Appeal). We make this proposal given our present intention to appeal the Court’s Claim Construction Order of August 16, 2019, and obviously we are continuing to carefully review that Order on behalf of our client to protect PersonalWeb’s rights.

Do let me know if you would like to discuss our proposal or if you would like to seek any clarification of our proposal.

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As to your letter of Friday, August 16, 2019, we do believe that our proposals of stipulations of non-infringement are both directly responsive to your letter and specifically to Court constructions of “authorization” terms and the “part” and part value” terms which you reference in your letter.

Very truly yours,



Michael A. Sherman

