

EXHIBIT 4

KIRKLAND & ELLIS LLP

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February 23, 2018

Via E-Mail

Michael A. Sherman
IP Law Group LLP
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Re: *PersonalWeb Techs., LLC, et al. v. Lithium Technologies, Inc.*, 5:18-cv-164-BLF (N.D. Cal.)

Dear Counsel:

I am writing on behalf of Lithium Technologies, LLC in response to your request for waiver of service of process in PersonalWeb's lawsuit against Lithium Technologies, Inc. There are several fatal errors in your recent complaint against Lithium Technologies, Inc., and you should dismiss the same before the Court's and parties' resources are wasted. The below list is not comprehensive, but is instead representative of PersonalWeb's lack of investigation prior to filing its complaint.

First, your complaint names Lithium Technologies, Inc. as defendant. That entity ceased to exist when it was converted to a Delaware limited liability company last year. We will not accept service of process for an entity that no longer exists.

Second, to the extent your complaint is based upon an alleged use of Ruby on Rails (*see, e.g.*, Complaint at ¶ 21), the named website (klout.com) was not developed with and has not used Ruby on Rails architecture from 2012 to 2016. Instead, it was based upon a different programming language and database that did not use a URI to access a file.

Third, to the extent your complaint bases its infringement theory upon use of "E-tags" in response to an "HTTP GET" request, the accused website did not use E-tags or any other ID based on a hash of the website's content to retrieve content, from cache or otherwise.

Even if you were successful in accusing the correct entity and serving that entity, your complaint is clearly deficient, as was your diligence in filing the complaint. Particularly troublesome is that PersonalWeb's complaint here is substantially identical to the over 50

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Michael A. Sherman
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complaints PersonalWeb has filed over the past month. It appears you performed no due diligence at all regarding each named defendant, and merely relied upon boilerplate allegations to haul parties into court.

If PersonalWeb does not dismiss its complaint immediately, we will seek dismissal and fees.

Sincerely,

/s/ Ryan M. Hubbard

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March 6, 2018

Via E-Mail

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Re: *PersonalWeb Techs., LLC, et al. v. Optimizely, Inc.*, 5:18-cv-167-BLF
(N.D. Cal.)

Dear Counsel:

I am writing on behalf of Optimizely Inc. We have reviewed your complaint in the above action, and there are several fatal errors. You should dismiss the same before the Court's and parties' resources are wasted. The below list is not comprehensive, but is instead representative.

PersonalWeb's complaint here is substantially identical to dozens of complaints PersonalWeb has filed in early 2018, each of which contain the same allegations based on defendants' use of Ruby on Rails. It also appears from your recent MDL motion that PersonalWeb intends to file additional identical actions. Yet your boilerplate allegations appear to be based on insufficient investigation as to individual defendants.

Your complaint against Optimizely is based upon an alleged use of Ruby on Rails (*see, e.g.*, Complaint at ¶ 21), but the named website (optimizely.com) was not developed with and has not used Ruby on Rails architecture from 2012 to 2016. Instead, www.optimizely.com is based upon a different programming language and library. Whatever diligence you may have performed for your allegations appears to be inadequate at best.

If PersonalWeb does not dismiss its complaint immediately, we will seek dismissal and fees.

Sincerely,

/s/ Ryan M. Hubbard

Ryan M. Hubbard

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March 7, 2018

Via E-Mail

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Re: *PersonalWeb Techs., LLC, et al. v. Hootsuite Media Inc.*, 4:18-cv-48-ALM (E.D. Tex.)

Dear Counsel:

I am writing on behalf of Hootsuite Inc. in response to your request for waiver of service of process in PersonalWeb's lawsuit against Hootsuite Inc. There are several fatal errors in your recent complaint against Hootsuite Media Inc., and you should dismiss the same before the Court's and parties' resources are wasted. The below list is not comprehensive.

First, your complaint names Hootsuite Media Inc. as defendant. That entity was renamed in November last year, as reflected by Texas Secretary of State records. We will not accept waiver for service of process naming an incorrect entity.

Second, to the extent your complaint is based upon an alleged use of Ruby on Rails (*see, e.g.*, Complaint at ¶ 22), the named website (hootsuite.com) was not developed with and has not used Ruby on Rails architecture from 2012 to 2016. Instead, it was based upon a different programming language and database.

PersonalWeb's complaint here is substantially identical to dozens of complaints PersonalWeb has filed over the past month. It also appears from your recent MDL motion that PersonalWeb intends to file additional identical actions. Yet your boilerplate allegations appear to be based on insufficient investigation as to individual defendants' use of Ruby on Rails.

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