

# EXHIBIT 4

**FILED**  
Superior Court of California  
County of Los Angeles  
05/20/2021

Sherri R. Carter, Executive Officer / Clerk of Court  
By:           R. Redmond           Deputy

1 Michael Gerard Fletcher (State Bar No. 070849)  
mfletcher@frandzel.com  
2 Craig A. Welin (State Bar No. 138418)  
cwelin@frandzel.com  
3 Bruce David Poltrock (State Bar No. 162448)  
bpoltrock@frandzel.com  
4 FRANDZEL ROBINS BLOOM & CSATO, L.C.  
1000 Wilshire Boulevard, 19<sup>th</sup> Floor  
5 Los Angeles, California 90017-2427  
Telephone: (323) 852-1000  
6 Facsimile: (323) 651-2577

7 Attorneys for Plaintiffs, BRILLIANT DIGITAL  
ENTERTAINMENT, INC.; EUROPLAY  
8 CAPITAL ADVISORS, LLC; CLARIA  
INNOVATIONS, LLC; and MONTO  
9 HOLDINGS PTY LTD

10  
11 **SUPERIOR COURT OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES - NORTHWEST DISTRICT (VAN NUYS)**

13 BRILLIANT DIGITAL ENTERTAINMENT,  
14 INC., a Delaware corporation; EUROPLAY  
CAPITAL ADVISORS, LLC, a Delaware  
15 limited liability company; CLARIA  
INNOVATIONS, LLC, a Delaware limited  
16 liability company; and MONTO HOLDINGS  
PTY LTD, an Australian company,

17 Plaintiffs,

18 v.

19 PERSONALWEB TECHNOLOGIES, LLC, a  
20 Texas limited liability company; and DOES 1  
through 100, Inclusive,

21 Defendants.  
22  
23

CASE No. 21VECV00575

[Case assigned for all purposes to the Hon.  
Judge Bernie C. LaForteza, Department U]

**STIPULATION FOR ENTRY OF  
PRELIMINARY INJUNCTION IN AID OF  
THE RECEIVER**

**[PROPOSED] ORDER**

OSC Date: June 1, 2021  
Time: 8:30 a.m.  
Place: Department U

24 Plaintiffs BRILLIANT DIGITAL ENTERTAINMENT, INC., a Delaware corporation;  
25 EUROPLAY CAPITAL ADVISORS, LLC, a Delaware limited liability company; CLARIA  
26 INNOVATIONS, LLC, a Delaware limited liability company; and MONTO HOLDINGS PTY  
27 LTD, an Australian company ("Plaintiffs"), on the one hand, and Defendant PERSONALWEB  
28 TECHNOLOGIES, LLC, a Texas limited liability company ("PersonalWeb" and/or "Defendant"),

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1 on the other hand, through their respective counsel of record, do hereby stipulate and agree to the  
2 issuance of a preliminary injunction in aid of the Receiver as set forth in the accompanying agreed  
3 Preliminary Injunction Order ("Order"); and to discharge and take off-calendar the order to show  
4 cause hearing set for June 1, 2021 ("OSC"), based on this Stipulation and the agreed to Order,  
5 submitted concurrently herewith.

6 **WHEREFORE**, the Parties hereby agree and stipulate to the following.

7 **STIPULATION**

8 **IT IS HEREBY STIPULATED AND AGREED** that:

9 1. PersonalWeb has been ordered by this Court in that certain Temporary Restraining  
10 Order In Aid of Receiver Pending Order to Show Cause As To Preliminary Injunction, entered  
11 herein on May 10, 2021 ("OSC Order"), to file opposition, if any, to issuance of the preliminary  
12 injunction by May 24, 2021.

13 2. This stipulation constitutes the PersonalWeb response to the OSC Order.

14 3. PersonalWeb stipulates and agrees that it has no objections to entry of the Order  
15 attached hereto as Exhibit 1, and stipulates and agrees to the entry thereof, immediately and  
16 without the need for any further proceedings in this matter.

17 4. PersonalWeb also has previously stipulated and agreed that no confirmation  
18 hearing was or is required regarding the *ex parte* appointment of Receiver, reaffirms such  
19 stipulation and agreement, and stipulates and agrees that no such confirmation is required herein.

20 5. This Stipulation may be executed in any number of counterparts, each of which,  
21 when executed and delivered, shall be deemed to be an original, and all of which, when taken  
22 together, shall constitute but one and the same Stipulation. Delivery of an executed counterpart of  
23 this Stipulation by facsimile shall be equally as effective as delivery of a manually executed  
24 counterpart of this Stipulation. Any party delivering an executed counterpart of this Stipulation by  
25 facsimile or email shall deliver a manually executed counterpart of this Stipulation but the failure  
26 to deliver a manually executed counterpart shall not affect the validity, enforceability, and binding  
27 effect of this Stipulation. This Stipulation, or signature page thereto intended to be attached to a  
28 copy of this Stipulation, signed and transmitted by facsimile machine or email shall be deemed


FRANZEL ROBINS BLOOM & CSATO, L.C.  
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR  
LOS ANGELES, CALIFORNIA 90017-2427  
(323) 852-1000

1 and treated as an original document.

2           **WHEREFORE**, the Parties each stipulate to and request that the Court enter the Order  
3 attached hereto as Exhibit 1, issue a preliminary injunction in aid of Receiver and take off-  
4 calendar and discharge the OSC hearing.

5 DATED: May 14, 2021


FRANDZEL ROBINS BLOOM & CSATO, LC

6  
7 By: 

8           MICHAEL GERARD FLETCHER  
9 Attorneys for Plaintiffs BRILLIANT DIGITAL  
10 ENTERTAINMENT, INC.; EUROPLAY CAPITAL  
11 ADVISORS, LLC; CLARIA INNOVATIONS, LLC;  
12 and MONTO HOLDINGS PTY LTD

11 DATED: May 13, 2021

LAW OFFICES OF RONALD RICHARDS &  
ASSOCIATES, A.P.C

14 By: 

15           RONALD RICHARDS  
16 Attorneys for Defendant PersonalWeb  
17 Technologies, LLC

18  
19           **CONSENT AND ACKNOWLEDGEMENT**

20  
21           The parties hereto acknowledge that they have separately authorized their respective legal  
22 counsel to enter into this Stipulation on their respective behalf, and consent to each and every  
23 term, covenant, condition, and statement made herein.

24  
25           **[Signatures on following pages]**  
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27  
28

FRANDZEL ROBINS BLOOM & CSATO, L.C.  
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR  
LOS ANGELES, CALIFORNIA 90017-2427  
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1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR  
LOS ANGELES, CALIFORNIA 90017-2427  
(323) 852-1000

1 DATED: May 13, 2021

PERSONALWEB TECHNOLOGIES, LLC, a Texas limited liability company

By: Michael Weiss  
Name: Michael Weiss  
Title: President

5 DATED: May 13, 2021

BRILLIANT DIGITAL ENTERTAINMENT, INC., a Delaware corporation

By: [Signature]  
Name: Anthony Neumann  
Title: Vice President

10 DATED: May 13, 2021

EUROPLAY CAPITAL ADVISORS, LLC, a Delaware limited liability company

By: Joseph Miller  
Name: Joseph Miller  
Title: Manager

14 DATED: May 13, 2021

CLARIA INNOVATIONS, LLC, a Delaware limited liability company

By: Joseph Miller  
Name: Joseph Miller  
Title: Authorized Signer

18 DATED: May \_\_, 2021

MONTO HOLDINGS PTY LTD, an Australian company

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

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