

EXHIBIT 4

From: [Michael Bubman](#)
To: [Todd Gregorian](#); [Christopher Lavin](#)
Cc: [Miller, M. Val](#); [Brick Kane](#); [Jeffrey Gersh](#)
Subject: Brilliant Digital Entertainment v. PersonalWeb Technologies
Date: Thursday, September 2, 2021 4:37:47 PM
Attachments: [Receivership Appointment Order \(00681433xB7A71\).pdf](#)
[Order for Preliminary Injunction in Aid of Appointment of Receiver \(00692635xB7A71\).pdf](#)
[9.2.21 Gregorian-Lavin letter \(00692656xB7A71\).pdf](#)

**** EXTERNAL EMAIL ****

Messrs. Gregorian and Lavin:

My apologies – the last email had the wrong attachments. Please see attached correspondence re the above-referenced matter.

Best regards,

Michael



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Please take note that my email address has changed



MIRMAN
BUBMAN
NAHMIAS

Michael E. Bubman
mbubman@mbnlawyers.com

September 2, 2021

VIA E-MAIL ONLY

Todd R. Gregorian, Esq.
Christopher S. Lavin, Esq.
Fenwick & West LLP
555 California Street, 12th Floor
San Francisco, California 94104

Re: Brilliant Digital Entertainment, Inc. v. PersonalWeb Technologies, LLC, etc.
LASC Case No. 21VECV00575 and
In re PersonalWeb Technologies, LLC USDC, et al., Case No. 5:18-md-02834-BLF (N.D.Cal.)

Dear Messrs. Davidson and Lavin:

To the extent you are unaware, I represent Robb Evans & Associates, LLC, State Court Appointed Receiver in the above-referenced State Court action. To the extent that you have not seen it, I am appending the two relevant orders regarding the receivership in the State Court action: (1) the Order Appointing Receiver; and (2) the June 1, 2021 Order for Entry of Preliminary Injunction in Aid of the Receiver. While I know that you are attempting to intervene in the State Court action, I wanted to make sure that you are fully aware of the two receivership-related orders in this case.

I am advised that you are attempting to continue prosecuting your efforts to obtain additional discovery responses from PersonalWeb in the District Court action referenced above. I refer you to Page 4, subsection (a) of the Preliminary Injunction, which prohibits you from:

“commencing, prosecuting, continuing or enforcing any suit, judgment, lien, levy, or proceeding against Defendant PersonalWeb, or any of its subsidiaries or affiliates, except such actions may be filed to toll any applicable statute of limitations.”

As you are seeking to engage the jurisdiction of the California Superior Court by way of your Motion to Intervene, I would submit you are similarly bound to follow its orders. Consequently, any continued efforts to obtain discovery or otherwise continue prosecuting your action against PersonalWeb would violate Judge LaForteza’s Preliminary Injunction Order in the State Court action. I cannot imagine that it is your intention to ignore Judge LaForteza’s order, which is the reason I wanted to make sure you have a copy it.

Todd R. Gregorian, Esq.
Christopher S. Lavin, Esq.
September 2, 2021
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If you have any questions or would like to further discuss this issue, feel free to contact me at your convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael E. Bubman", with a long horizontal flourish extending to the right.

Michael E. Bubman

MEB

cc: Val Miller, Esq.
Brick Kane
Jeffrey Gersh, Esq.

Todd R. Gregorian, Esq.
Christopher S. Lavin, Esq.
September 2, 2021
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