

**EXHIBIT 4**

# Oath:

Request for information regarding: bobcostello@yahoo.com, et al.

I, Mark Ludlow, declare:

1. I am a Custodian of Records for Oath Holdings Inc. ("Oath"), located in California. I am authorized to submit this declaration on behalf of Oath. I make this declaration in response to a subpoena dated October 26, 2021, ("the request") issued in the above-referenced matter. I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.

2. Attached hereto are true and correct copies of the following data in the custody of Oath pertaining to the relevant user account(s) responsive to the request: (1) subscriber details; (2) the dates, times, and Internet protocol addresses for logins and authentication events (if any). I further state that:

- a. Oath's servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted, and this data is kept in the course of this regularly conducted business activity, and was made by Oath as a regular practice.
- b. Such records were generated by Oath's electronic processing system(s) that produced an accurate result; and
- c. The records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Oath in a manner to ensure that they are true copies of the original records.

3. I further state that this declaration is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

4. Oath may not require or verify user information because it offers many of its services to users for free. The file folder names and structures contained in this production are not business records. To the extent any document attached hereto contained information that exceeded the scope of the request, is protected from disclosure, or is otherwise not subject to production, such information has been redacted or otherwise removed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

11/9/2021

Date



Mark Ludlow