

# **EXHIBIT 4**

**CORRECTIONS TO MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT  
OF DEFENDANT-COUNTERCLAIMANT PUBLIC.RESOURCE.ORG'S MOTION  
FOR SUMMARY JUDGMENT AND OPPOSITION TO PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT AND PERMANENT INJUNCTION (ECF NOS. 68-2 (UNDER  
SEAL) AND 69-1 (REDACTED))**

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COURT: USDC

Case No. 1:14-cv-00857-TSC-DAR

Page No.	Line No.	Original Incorrect Citation	Corrected Citation
3	14	<i>Id.</i> ¶ 2	<i>Id.</i> ¶ 3
25	7-8	SMF ¶ 59	SMF ¶ 97
25	9	SMF ¶ 59 ( <i>Id.</i> )	SMF ¶ 58
25	18	SMF ¶ 59 ( <i>Id.</i> )	SMF ¶ 59
25	19	SMF ¶ 60	SMF ¶ 59
26	3	SMF ¶ 61	SMF ¶ 60
27	15	SMF ¶ 62	SMF ¶ 61
28	6	SMF ¶ 63	SMF ¶ 62
28	7	SMF ¶ 64	SMF ¶ 63
28	9	SMF ¶ 65	SMF ¶ 64
28	11	SMF ¶ 66	SMF ¶ 65
28	14-15	SMF ¶ 67	SMF ¶ 66
28	16	SMF ¶ 68	SMF ¶ 67
30	3	SMF ¶ 46 ( <i>Id.</i> )	SMF ¶ 47
30	6	SMF ¶ 46 ( <i>Id.</i> )	SMF ¶ 47
33	6	SMF ¶ 76	SMF ¶ 78
33	7	SMF ¶ 78	SMF ¶ 79
33	10	SMF ¶ 79	SMF ¶ 81
33	11	<i>Id.</i> ¶ 80	<i>Id.</i> ¶ 82
34	14	SMF ¶ 81	SMF ¶ 83
34	17	SMF ¶ 82	SMF ¶ 84
34	19	SMF ¶ 83	SMF ¶ 85
36	21	SMF ¶ 84	SMF ¶ 86
40	9	SMF ¶ 85–86	SMF ¶ 87–88
41	4	SMF ¶ 87	SMF ¶ 89
41	14	SMF ¶ 88	SMF ¶ 90
41	16	SMF ¶ 90 ( <i>Id.</i> )	SMF ¶ 90
41	18	SMF ¶ 90 ( <i>Id.</i> )	SMF ¶ 90
41	19	SMF ¶ 86	SMF ¶ 88
42	2	SMF ¶ 89	SMF ¶ 91
42	4	SMF ¶ 90–91	SMF ¶ 92–93
42	7	SMF ¶ 92	SMF ¶ 94
44	2	SMF ¶ 93	SMF ¶ 95
45	16	SMF ¶ 94	SMF ¶ 96

Page No.	Line No.	Original Incorrect Citation	Corrected Citation
45	18	SMF ¶ 95	SMF ¶ 97
53	22	SMF ¶ 98	SMF ¶ 100
57	1-2	SMF ¶ 38	SMF ¶ 40

**CORRECTIONS TO STATEMENT OF MATERIAL FACTS IN SUPPORT OF  
DEFENDANT-COUNTERCLAIMANT PUBLIC.RESOURCE.ORG, INC.'S MOTION  
FOR SUMMARY JUDGMENT AND OPPOSITION TO PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT AND PERMANENT INJUNCTION (ECF NOS. 68-3 (UNDER  
SEAL) AND 69-2 (REDACTED))**

Paragraph Number	Original Incorrect Citation	Corrected Citation
PARAGRAPH 26	ICE Ex. 64	ICE Ex. 65
PARAGRAPH 27	ICE Ex. 64	ICE Ex. 65
PARAGRAPH 29	ICE Ex. 71	ICE Ex. 72
PARAGRAPH 31	ICE Ex. 64	ICE Ex. 65
PARAGRAPH 32	ICE Ex. 64	ICE Ex. 65
PARAGRAPH 33	ICE Ex. 65	ICE Ex. 66
PARAGRAPH 33	ICE Ex. 66	ICE Ex. 67
PARAGRAPH 33	ICE Ex. 67	ICE Ex. 68
PARAGRAPH 33	ICE Ex. 68	ICE Ex. 69
PARAGRAPH 34	ICE Ex. 69	ICE Ex. 70
PARAGRAPH 34	ICE Ex. 70	ICE Ex. 71
PARAGRAPH 52	ICE Ex. 53	ICE Ex. 52
PARAGRAPH 66	ICE Ex. 54	ICE Ex. 53
PARAGRAPH 66	ICE Ex. 55	ICE Ex. 54
PARAGRAPH 68	ICE Ex. 56	ICE Ex. 55
PARAGRAPH 69	ICE Ex. 57	ICE Ex. 56
PARAGRAPH 70	ICE Ex. 58	ICE Ex. 57
PARAGRAPH 71	ICE Ex. 59	ICE Ex. 58
PARAGRAPH 72	ICE Ex. 60	ICE Ex. 59
PARAGRAPH 72	ICE Ex. 61	ICE Ex. 60

**CORRECTIONS TO DEFENDANT-COUNTERCLAIMANT  
PUBLIC.RESOURCE.ORG, INC.'S STATEMENT OF DISPUTED FACTS IN  
OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND  
PERMANENT INJUNCTION (ECF NOS. 68-4 (UNDER SEAL) AND 69-3 (REDACTED))**

<b>Paragraph Number</b>	<b>Original Incorrect Citation</b>	<b>Corrected Citation</b>
PARAGRAPH 5	ICE Ex. 63	ICE Ex. 62
PARAGRAPH 5	ICE Ex. 62	ICE Ex. 63
PARAGRAPH 6	ICE Ex. 63	ICE Ex. 62
PARAGRAPH 6	ICE Ex. 62	ICE Ex. 63
PARAGRAPH 7	ICE Ex. 63	ICE Ex. 62
PARAGRAPH 7	ICE Ex. 62	ICE Ex. 63
PARAGRAPH 8	ICE Ex. 63	ICE Ex. 62
PARAGRAPH 8	ICE Ex. 62	ICE Ex. 63
PARAGRAPH 22	ICE Ex. 52-55	ICE Ex. 52-56
PARAGRAPH 31	ICE Ex. 63	ICE Ex. 62
PARAGRAPH 31	ICE Ex. 62	ICE Ex. 63
PARAGRAPH 35	ICE Ex. 60	ICE Ex. 59