Exhibit 4

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
individually and as parent and legal
guardian of W.W., K.W., G.W., and L.W.,
minor children, and MATTHEW
WADSWORTH,

     Plaintiffs,

v.

WALMART INC. and JETSON
ELECTRIC BIKES, LLC,

     Defendants.

Case No. 2:23-CV-118-KHR

JURY TRIAL DEMANDED

DECLARATION OF YATHAVAPILAS ITHAYAKUMAR

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

Personal Background and Qualifications

1) I am the Chief Transformation Officer at Morgan & Morgan. I have been leading technology and operations at Morgan & Morgan for 6 years, with over a decade of experience in technology transformation and operational leadership. Prior to Morgan & Morgan, I worked at Elsevier (part of Relx Group) where I collaborated with various business groups on technology integration and market deployment. Subsequently, I worked at HighWire, an Accel-KKR portfolio company, focusing on new technology development and go-to-market strategies. My educational background includes a Bachelor's degree from the University of Toronto and an MBA from the Beedie School of Business at Simon Fraser University.

Team Structure and Responsibilities

1

2) I lead a high-caliber technology and operations team that includes experienced professionals from leading technology companies such as Google, Microsoft, and Amazon. We are responsible for driving technological transformation and operational excellence across Morgan & Morgan's infrastructure.

Tool Development and Launch

3) On November 15th, 2024, our team launched MX2.law, a proprietary AI-powered legal assistance system. This platform was developed as a private AI tool, specifically customized to meet our firm's stringent requirements for privacy and security protocols, including HIPAA compliance.

4) Our decision to develop an in-house system was based on several critical factors:

   a) Privacy and Compliance: We required a system that would meet stringent privacy standards and HIPAA compliance requirements, which could be guaranteed only through a customized solution.

   b) Integration Capabilities: We wanted seamless integration with our existing document management platform to ensure ease of use for our attorneys and maintain workflow efficiency.

   c) User Experience: By developing our own solution, we could create an intuitive interface tailored to our attorneys' specific needs and workflows.

   d) Usage Transparency: A proprietary system provides us with comprehensive audit capabilities, allowing us to review system usage patterns, ensuring appropriate use and maintaining security protocols.

   e) Control over Data: This approach gives us full control over our sensitive client information and internal documents while leveraging advanced AI capabilities.

5) The system leverages best-in-class AI model functionality while maintaining strict data protection standards. MX2.law was designed to enhance attorney productivity by enabling them to interact with their documents through AI-powered features, including:

   a) Document summarization capabilities;

   b) Search functionality within documents;

   c) Draft assistance and document composition; and

   d) Secure document processing with HIPAA-compliant data handling.

6) The primary aim of MX2.law was to help our attorneys work more effectively and efficiently. In our launch communications, we emphasized responsible use of the system by explicitly stating the potential risks. We specifically instructed all users that AI-generated responses can "hallucinate" or make mistakes, and we mandated that all AI-generated content must be reviewed by attorneys before use. This approach ensures that while leveraging advanced technology, we maintain our high standards of legal practice and due diligence.

Training Implementation

7) Following the launch, we implemented a comprehensive training program that included:

   a) A firm-wide webinar for all attorneys, which was recorded and distributed for future reference;

   b) Detailed documentation on system usage and best practices;

   c) Optional small-group hands-on training sessions for more personalized instruction; and

   d) Ongoing support through our Learning & Development team.

8) While our Learning & Development team, which reports to me, created the training materials, I personally conducted training sessions alongside our head of product. This

3

direct involvement by senior leadership emphasized the strategic importance of both

efficient system usage and understanding the technology's limitations.

Key Training Components

9) The most relevant aspects of our training program were:

    a) Emphasis on responsible AI usage, including explicit warnings about the potential for

        the system to generate incorrect information;

    b) Hands-on demonstration of system features and practical applications;

    c) Clear guidelines for reviewing and validating AI-generated content;

    d) Documentation of best practices and risk mitigation strategies; and

    e) Interactive Q&A sessions to address specific attorney concerns and use cases.

System Recovery and Access

10) We have successfully retrieved user activity for January 22, 2025.

11) We maintain complete records of the system, including:

    a) User access logs;

    b) Transaction records; and

    c) System modifications and updates.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed on February 13, 2025   /s/ Yathavapilas Ithayakumar
                                                      Chief Transformation Officer
                                                      Morgan & Morgan