

1 RANDALL S. NEWMAN (SBN 190547)
2 Attorney at Law
3 99 Wall St., Suite 3727
4 New York, NY 10005
5 212.797.3735
6 rsn@randallnewman.net

7 *Attorney for Plaintiff,*
8 *Christopher J. Cordova*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 CHRISTOPHER J. CORDOVA,

12 Plaintiff,

13 vs.

14 JONATHAN HUNEALT,

15 Defendant.

Case No. 25-cv-04685-VKD

HON. VIRGINIA K. DeMARCHI

**STATUS REPORT AND REQUEST
TO VACATE CASE MANAGEMENT
DEADLINES**

1 Plaintiff Christopher J. Cordova (“Plaintiff”) respectfully submits this Status Report
2 pursuant to the Court’s June 4, 2025 Order Setting Initial Case Management Conference
3 & ADR Deadlines (ECF No. 4) and requests that the Court vacate the current case
4 management deadlines in light of developments bearing on identification and service.

5 **Status of Identification and Service**

6 This action concerns online copyright infringement committed via the anonymous
7 YouTube channel titled “Frauditor Troll.” On July 16, 2025, the Court granted Plaintiff’s
8 request to serve a subpoena on Google LLC (“Google”) prior to the Rule 26(f) conference
9 to obtain account and subscriber information for the Frauditor Troll channel (ECF No. 12).
10 Compliance with that subpoena is due on August 25, 2025. However, based on Google’s
11 responses in other matters pending before this Court, Plaintiff does not expect timely or
12 complete production¹. This anticipated delay further underscored why the current case
13 management deadlines should be vacated. Until Google produces subscriber and
14 ownership records, including a physical address, Plaintiff cannot confirm the defendant’s
15 legal identity, effect service, or conduct a Rule 26(f) conference.

16 On August 7, 2025, the individual operating the Frauditor Troll channel appeared in
17 a publicly posted video (since removed), revealed his face for the first time, identified
18 himself as “Jonathan,” and stated that he resides in Canada. Plaintiff has not yet confirmed
19 whether that individual is the legal owner of the channel or otherwise the party responsible
20 for the infringing uploads.

21 Previously, a DMCA counter-notification associated with the accused content listed
22 the name “Jonathan Huneault,” identified as the Defendant, and listed his address at 99
23 Wall Street, New York, New York 10005 with no suite number. In the August 7, 2025 face
24 reveal, “Jonathan” all but admitted that he never resided at 99 Wall Street.

25 _____
26 ¹ Plaintiff anticipates having to file a Motion to Compel compliance with the Google subpoena based on
27 responses Google has made to 17 U.S.C. § 512(h) subpoenas pending before this court using nearly
28 identical language to the subpoena approved in the Court’s July 16, 2025 Order (ECF No. 12). *See, e.g.,*
In Re Subpoena to Google 25-mc-80179-VKD, 25-mc-80190-VDK. In those cases, Google claimed it
need only produce the subscriber’s email address, rather than the full account information requested.

1 **Rule 4(m) and Foreign Service**

2 Because it appears that service will be made outside the United States, Rule 4(m)'s
3 90-day period does not apply. See Fed. R. Civ. P. 4(m) (excluding service in a foreign
4 country). Depending on whether the Frauditor Troll channel is owned by Huneault or an
5 entity, Plaintiff anticipates requesting leave to serve the defendant by email under Rule
6 4(f)(3) once Google provides the necessary contact information. In the meantime, good
7 cause exists to vacate the current case management deadlines because the delay in service
8 is due to Defendant's refusal to accept service of the complaint and third-party compliance,
9 not inaction by Plaintiff.

10 **Request for Relief**

11 Plaintiff respectfully requests that the Court:

12 1. Vacate the deadlines set in the June 4, 2025 Order Setting Initial Case
13 Management Conference & ADR Deadlines (ECF No. 4), including the August 12, 2025
14 ADR and Rule 26(f) deadlines, the August 26, 2025 initial disclosures and joint case
15 management statement deadlines, and the September 2, 2025 Initial Case Management
16 Conference; and

17 2. Reset case management deadlines to a date approximately 60 days after
18 Plaintiff files proof of service under Rule 4(f) or, in the alternative, set a status conference
19 60 days from now if subpoena compliance remains outstanding.

20
21 Dated: August 10, 2025

22 /s/ Randall S. Newman
23 Randall S. Newman, Esq. (SBN 190547)
24 99 Wall Street, Suite 3727
25 New York, NY 10005
26 (212) 797-3735
27 rsn@randallnewman.net

28 *Attorney for Plaintiff,*
Christopher J. Cordova