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

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

11
12 CHRISTOPHER J. CORDOVA,

13 Plaintiff,

14 vs.

15
16 JONATHAN HUDON-HUNEAULT,
17 NNEKA OHIRI,

18 Defendants.
19

Case No. 25-cv-04685-VKD

DECLARATION IN SUPPORT
OF REQUEST FOR DEFAULT

1 RANDALL S. NEWMAN, pursuant to 28 U.S.C. § 1746 declares under penalties of
2 perjury as follows:

3 1. That I am the attorney for Plaintiff, Christopher J. Cordova, in the above
4 referenced matter and I am admitted to practice in this Court. I am fully familiar with all
5 the facts, circumstances and proceedings heretofore had herein.

6 2. This action was commenced pursuant to 17 U.S.C. §§101, *et seq.* A copy of
7 the Summons and Complaint was served on the Defendant, **NNEKA OHIRI** as set forth
8 in the Proof of Service by Randall S. Newman, which was filed with the Court on
9 September 15, 2025 as ECF Document No. 27.

10 3. Service on Defendant via email was authorized by Order of the Court dated
11 September 12, 2025 (ECF No. 26).

12 4. The time within which the Defendant may answer or otherwise move with
13 respect to the Complaint herein has expired. Defendant, **NNEKA OHIRI**, has not
14 answered or otherwise moved with respect to the Complaint, and the time for the Defendant
15 to do so has not been extended.

16 5. On October 8, 2025, I asked Steven Vondran, counsel for co-defendant
17 Jonathan Hudon-Huneault whether he represented **NNEKA OHIRI**. Mr. Vondran stated
18 that he was unsure and would confirm but never followed up. As of the date of this
19 declaration, no attorney has entered an appearance for **NNEKA OHIRI**, and no responsive
20 pleading or motion has been filed on her behalf.

21 6. I declare under penalty of perjury that the foregoing is true and correct.
22

23 WHEREFORE, Plaintiff, Christopher J. Cordova, requests that the default of
24 Defendant, **NNEKA OHIRI**, be noted by the Clerk in favor of Plaintiff and against
25 Defendant in the manner stated herein.

26 Dated: October 14, 2025 s/ Randall S. Newman
27 Randall S. Newman, Esq. (190547)
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