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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, 14693663 CANADA  
18 INC.,

19 Defendants.

Case No. 25-cv-04685-VKD

**DECLARATION IN SUPPORT**  
**OF REQUEST FOR DEFAULT**

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

3 1. I am the attorney for Plaintiff, Christopher J. Cordova, in the above referenced  
4 matter and I am admitted to practice in this Court. I am fully familiar with the facts and  
5 procedural history of this action.

6 2. This action was commenced by filing a Complaint that was amended prior to  
7 service (ECF Nos. 1, 20).

8 3. A copy of the Summons and Complaint (ECF No. 20) was served on  
9 Defendant, **NNEKA OHIRI** as set forth in the Proof of Service by Randall S. Newman,  
10 which was filed with the Court on September 15, 2025. (ECF No. 27).

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

13 5. Defendant was required to answer or otherwise respond to the Complaint on  
14 or before October 13, 2025, and failed to do so.

15 6. On October 14, 2025, Plaintiff filed a Request for Entry of Default with the  
16 Clerk as to **NNEKA OHIRI**. (ECF No. 30).

17 7. On October 16, 2025, the Court approved a Stipulation between the parties  
18 whereby Plaintiff agreed to vacate the default and file a First Amended Complaint on or  
19 before November 3, 2025. In that stipulation **NNEKA OHIRI** agreed to file a response to  
20 Plaintiff's First Amended Complaint on or before November 24, 2025. (ECF No. 36, ¶¶ 3-  
21 4, 6).

22 8. **NNEKA OHIRI** failed to file a response to Plaintiff's First Amended  
23 Complaint by November 24, 2025. Although **NNEKA OHIRI**'s name appears in the  
24 electronic docket text generated by the ECF system for the other named Defendants'  
25 Motion to Dismiss (ECF No. 43), she was not named as a moving party in the Notice of  
26 Motion, was not identified in the caption or headings, sought no relief on her behalf, and  
27 no arguments were asserted for her in either the Notice of Motion (ECF No. 43) or the  
28

1 Memorandum in Support thereof (ECF No. 43-1). Accordingly, **NNEKA OHIRI** did not  
2 join in the motion and did not otherwise respond to the First Amended Complaint.

3 9. Accordingly, the time within which Defendant may respond to the First  
4 Amended Complaint herein has expired. Defendant, **NNEKA OHIRI**, has not answered  
5 or otherwise moved with respect to the First Amended Complaint, and the time for her to  
6 do so has not been extended.

7 10. As of the date of this declaration, no responsive pleading or motion has been  
8 filed on behalf of **NNEKA OHIRI**.

9 11. I declare under penalty of perjury that the foregoing is true and correct.

10 WHEREFORE, Plaintiff, Christopher J. Cordova, requests that the default of  
11 Defendant, **NNEKA OHIRI**, be noted by the Clerk in favor of Plaintiff and against  
12 Defendant pursuant to Federal Rule of Civil Procedure 55(a).

13  
14 Dated: December 15, 2025

s/ Randall S. Newman  
Randall S. Newman, Esq. (190547)