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

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

11 CHRISTOPHER J. CORDOVA,

12
13 Plaintiff,

14 vs.

15 JONATHAN HUDON-HUNEAULT,
16 NNEKA OHIRI, 14693663 CANADA
17 INC.,

18 Defendants.
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Case No. 25-cv-04685-VKD

HON. VIRGINIA K. DEMARCHI

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
REMOTE APPEARANCE OF
COUNSEL**

HEARING:

Date: January 13, 2026

Time: 10:00 a.m.

Place: 280 South 1st St.

Courtroom 2 (5th Floor)

San Jose, CA 95113

1 Pursuant to Local Rule 7-12, it is stipulated between and among Plaintiff Christopher
2 J. Cordova (“Plaintiff”) and Defendants Jonathan Hudon-Huneault, Nneka Ohiri and
3 14693663 CANADA INC. (“Defendants”) (together, “the Parties”), through their
4 respective counsel, as follows:

5 WHEREAS, the Court has scheduled a hearing on January 13, 2026 at 10:00 a.m.
6 regarding Defendants’ pending Motion to Dismiss Counts 2, 3, and 4 of the First Amended
7 Complaint; and

8 WHEREAS, Counsel for the Parties are located in multiple jurisdictions, and
9 requiring in-person appearance would impose unnecessary travel expense and logistical
10 burden without providing any corresponding benefit to the Court; and

11 WHEREAS, the issues to be addressed at the upcoming hearing are legal in nature,
12 do not require witness testimony, and can be fully and efficiently presented via remote
13 appearance; and

14 WHEREAS, allowing a remote appearance will promote judicial economy, reduce
15 costs, and conserve party and Court resources; and

16 WHEREAS, this request is made in good faith and for no improper purpose and no
17 party will be prejudiced by permitting remote appearance.

18 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the Parties,
19 through their respective counsel and subject to the Court’s approval, that:

- 20 1. Counsel for the Parties be permitted to appear remotely by Zoom at the
21 scheduled hearing.
- 22 2. Nothing in this stipulation is intended to, nor shall it be construed to, address
23 or concede the scope or applicability of any pending motion as to any party.

24 **IT IS SO STIPULATED.**

1 Dated: December 18, 2025

2 /s/ Randall S. Newman
3 Randall S. Newman, Esq. (SBN 190547)
4 99 Wall Street, Suite 3727
5 New York, NY 10005
6 (212) 797-3735
7 rsn@randallnewman.net

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

10 Dated: December 18, 2025

11 /s/ Steven C. Vondran
12 Steven C. Vondran, Esq. (232337)
13 620 Newport Center Drive, Suite 1100
14 Newport Beach, CA 92660
15 (949) 945-8700
16 steve@vondranlegal.com

17 *Attorney for Defendants*

18 **ECF CERTIFICATION**

19 The filing attorney attests that he has obtained concurrence regarding the filing of
20 this document from the signatories to this document.

21
22 Dated: December 18, 2025

23 /s/ Randall S. Newman
24 Randall S. Newman

[PROPOSED] ORDER

Having reviewed the above Stipulation and Proposed Order, PURSUANT TO STIPULATION, IT IS SO ORDERED that the Court finds good cause exists for the entry of this Order.

IT IS SO ORDERED.

Dated: _____

VIRGINIA K. DEMARCHI,
UNITED STATES MAGISTRATE JUDGE

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