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*Attorney for Plaintiff,
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHRISTOPHER J. CORDOVA,

Plaintiff,

vs.

JONATHAN HUDON-HUNEULT,
NNEKA OHIRI, 14693663 CANADA
INC.,

Defendants.

Case No. 25-cv-04685-VKD

HON. VIRGINIA K. DEMARCHI

**STIPULATION AND [PROPOSED]
ORDER TO SET ASIDE ENTRY OF
DEFAULT**

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

4 WHEREAS, an entry of default was entered as to Defendant on December 15, 2025
5 (ECF No. 47); and

6 WHEREAS, the Parties agree that setting aside the default at this time will promote
7 the efficient administration of justice and permit the case to proceed on the merits without
8 unnecessary motion practice; and

9 WHEREAS, Plaintiff does not oppose setting aside the default solely for the purpose
10 of allowing Defendant to file an answer to the First Amended Complaint (“FAC”); and

11 WHEREAS, Defendant agrees to file an answer to the FAC within fourteen (14)
12 days of the Court’s Order approving this stipulation; and

13 WHEREAS, this stipulation is entered into in good faith, for no improper purpose,
14 and without any prejudice to any party’s substantive arguments, defenses, or positions,
15 including any arguments raised in or related to any pending motion.

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

- 18 1. The entry of default as to Defendant Nneka Ohiri is set aside.
- 19 2. Defendant shall file an answer to the FAC within fourteen (14) days of the
20 Court’s Order approving this Stipulation.

21 **IT IS SO STIPULATED.**

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1 Dated: December 22, 2025

/s/ Randall S. Newman
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*Attorney for Plaintiff,
Christopher J. Cordova*

8 Dated: December 22, 2025

/s/ Steven C. Vondran
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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.

22 Dated: December 22, 2025

/s/ Randall S. Newman
Randall S. Newman

[PROPOSED] ORDER

Having reviewed the above Stipulation and Proposed Order, the Court finds good cause exists for the entry of this Order.

IT IS SO ORDERED.

Dated: _____

VIRGINIA K. DEMARCHI,
UNITED STATES MAGISTRATE JUDGE