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7 Attorney for Defendants and Counterclaimants: JONATHAN HUDON-HUNEAULT,
8 NNEKA OHIRI, and 14693663 CANADA INC

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

12 CHRISTOPHER J CORDOVA, an
13 individual,

14 Plaintiff,

15 vs.

16
17 JONATHAN HUDON-HUNEAULT,
18 NNEKA OHIRI, and
19 14693663 CANADA INC.

20
21 Defendant(s) and
22 Counterclaimant(s).

Case No. 5:25-cv-04685-VKD

**DEFENDANT'S RESPONSE TO
DOCKET NUMBER 59**

1 **To the Court and all parties:** The motion to dismiss causes of action 2, 3 and 4
2 were filed by Defendant Jonathan Huneault and his Canadian corporation, with the
3 understanding that it was to include his wife as well - which Plaintiff disputes (the motion
4 was taken under submission) but has not yet been ruled on.
5

6 There was no challenge to the first cause of action for copyright infringement for
7 any of the defendants as the court appeared disinclined to resolve the copyright
8 infringement claim on motion to dismiss, so the answer and counterclaim were filed on
9 behalf of all defendants to avoid a potential default (two previous defaults were filed by
10 Defendant without notice), and even if causes of action 2, 3 and 4, or any combination
11 are dismissed, the answer and counterclaim should still stand for all defendants.
12

13 To Clarify, the existing motion to dismiss will stay on calendar until ruled on.
14

15 Respectfully Submitted,
16

17 DATED: January 7, 2026

**THE LAW OFFICES OF STEVEN C.
VONDRAN, P.C.**

18
19
20 By: /s/ Steven C. Vondran, Esq.
21 Steven C. Vondran, [SBN 232337]
22 Attorney for Defendants and Counterclaimants
23 JONATHAN HUDON-HUNEALD;
24 NNEKA OHIRI AND 14693663 CANADA
25 INC.
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CERTIFICATE OF SERVICE

I served this document as follows on January 7, 2026:

xx **ELECTRONIC FILING:** I filed the above-described document(s) electronically through the Court’s ECF filing system to all registered users.

SERVICE LIST

RANDALL S. NEWMAN (SBN 190547)
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I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed on January 7, 2026.

/s/ Lisa Vondran
Lisa Vondran, legal assistant

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