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

CHRISTOPHER J. CORDOVA,

Plaintiff,

vs.

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

Defendants.

Case No. 25-cv-04685-VKD

HON. VIRGINIA K. DEMARCHI

**DECLARATION OF RANDALL S.
NEWMAN IN SUPPORT OF
PLAINTIFF'S MOTION TO AMEND
CASE MANAGEMENT ORDER AND
EXTEND DEADLINE TO AMEND
PLEADINGS**

HEARING:

Date: March 31, 2026
Time: 10:00 a.m.
Place: 280 South 1st St.
Courtroom 2 (5th Floor)
San Jose, CA 95113

1 approximately sixty days. This information was based on registration applications Plaintiff
2 filed for the *Belmar Library* video in June 2025 as well as other registrations (not at issue
3 in this matter) that he filed in August 2025.

4 9. At the Initial Scheduling Conference on November 4, 2025, the Court
5 proposed a date of February 2, 2026 for amending the pleadings. Based on the sixty-day
6 processing time Plaintiff had experienced in his prior 2025 copyright registrations, Plaintiff
7 believed that the registration for *Courthouse Fail* would issue in December 2025 so a
8 February 2, 2026 date seemed well within the time needed to amend.

9 10. However, as of today, the U.S. Copyright Office has not issued the registration
10 for *Courthouse Fail* nor have they requested any additional information related to the
11 registration. As a result, registration for *Courthouse Fail* should issue any day. Once issued,
12 Plaintiff intends to amend the operative complaint to add a claim for infringement and
13 injunctive relief as to the video that is currently live on the Frauditor Troll Channel.

14 11. On January 26, 2026, I emailed Defendants' counsel and asked whether
15 Defendants would stipulate to a limited amendment of the Case Management Order, and
16 Defendants refused to stipulate, stating, "[h]ad you filed for expedited registration there
17 would be no issues. We will oppose."

18 12. As of the filing of this Motion, Defendants have produced no documents in
19 response to Plaintiff's November 2025 Requests for Production, and no depositions have
20 taken place. Discovery remains in its early stages.

21 13. I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct.

23 Executed on this 30th day of January, 2026.

24
25 s/ Randall S. Newman

26 Randall S. Newman

Check Registration Case Status

- [Open Cases](#)
- [Working Cases](#)
- [All Cases](#)
- [My Company's Cases](#)
- [Status Definitions](#)
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- [My Company's Applications](#)

Copyright Registration

Register a Work

Standard Application
This Application may NOT be used to submit "Unpublished Collections." You must select "Register a Group of Unpublished Works" below to register multiple unpublished works

Other Registration Options

- Note: Restrictions Apply*
- [Register Certain Groups of Published Works](#)
 - [Register a Group of Photographs](#)
 - [Register a Group of Unpublished Works](#)
 - [Register One Work by One Author](#)
 - [Correct or Amplify an Existing Registration](#)

Other Services

Note: Substantial Fees Required
[Preregistration of Certain Types of Work](#)

Miscellaneous

- [Use an Existing Template](#)
- [Organization/Deposit Account](#)

Additional Copyright Services

- [Access Copyright Office Information](#)
- [- Ask a Question](#)
 - [- Read Circulars](#)
 - [- Search Online Records](#)

Electronic Copyright Office (eCO)

Welcome, Christopher!

- Please disable your browser's pop-up blocker
- [What's new in eCO?](#)
- For copyright registration information, instructions, helpful tips and FAQs, [click here](#)
- If you received a Notice for Mandatory Deposit for an electronic work and need more information or help, [click here](#)

Open Cases

Case #	Status	Opened	Title of Work	Vo/ Num/Issue	Month Year	Type of Work	Appl. Format	Appl. Form	Fee Paid	Upload Status	Closed
1-15021917531	Open	10/15/2025	FEDERAL COURTHOUSE FAIL!!! Threatened with arrest for recording and not one officer identifies!			Motion Picture/AV Work	Standard		\$65.00	Complete	

eCO information

The eCO system will be offline for maintenance on Saturday, January 31 from 7:00 AM to Noon and again from 6:00 PM until 6:00 AM on Sunday, February 1.

IMPORTANT NOTE: You may register up to 10 unpublished works on the same application. To do so, YOU MUST SELECT the link for "Register a Group of Unpublished Works." [Click here](#) if you need help finding this link. [Click here](#) to watch a video that provides step-by-step instructions for completing the application for a "Group of Unpublished Works."

The "Standard Application" MAY NOT BE USED to register a "collection" of unpublished works. If you submit 2 or more unpublished works on the "Standard Application" the Copyright Office may register only 1 of your works and remove the remaining works from the claim. To register those works you will need to resubmit them using an appropriate application form.

The eCO Registration System will be offline every weekend from 10:00 PM Saturday until 6:00 AM Sunday (Eastern Time) for scheduled maintenance.

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. § 705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

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