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

9		)	
10	CHRISTOPHER J. CORDOVA,	)	Case Number: 5:25-cv-04685-VKD
11	Plaintiff,	)	
12	vs.	)	<b>DEFENDANTS’ ADMINISTRATIVE</b>
13	JONATHAN HUDON-HUNEALT,	)	<b>MOTION PURSUANT TO CIVIL LOCAL</b>
14	NEKA OHIRI, 14693663 CANADA INC.,	)	<b>RULE 7-11: (A) ENLARGING TIME FOR</b>
15	Defendants.	)	<b>RESPONSE PAPERS FOR ECF Nos: 64</b>
16		)	<b>and 66; and (B) TO CONTINUE</b>
17		)	<b>HEARING DATES FOR ECF Nos: 64 and</b>
18		)	<b>61</b>
19		)	<b>Judge:</b> Magistrate Judge Virginia K.
20		)	Demarchi
21		)	<b>Complaint Filed:</b> June 3, 2025
22		)	<b>Trial Date:</b> February 1-2, 2027 (Bench Trial)
23		)	
24		)	
25		)	
26		)	

DEFENDANTS’ ADMINISTRATIVE MOTION PURSUANT TO CIVIL LOCAL RULE 7-11:  
(A) ENLARGING TIME FOR RESPONSE PAPERS FOR ECF Nos: 64 and 66; and (B) TO  
CONTINUE HEARING DATE FOR ECF Nos: 64 and 61; Case Number: 5:25-cv-04685-VKD

1 **TO THIS HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS:**

2 Pursuant to Civ. L.R. 7-11, Defendants hereby move the Court for an Order:

- 3 a. enlarging the deadline to February 20, 2026 for the Defendants' response papers  
4 for Plaintiff's Motion to Dismiss Counts 1 and 2 (ECF No. 64) and the  
5 Defendants' response papers for Plaintiff's Motion to Amend Case Management  
6 Order and Extending Deadline (ECF No. 66); and  
7 b. continuing the March 3, 2026 hearing for Plaintiff's Motion to Dismiss Counts 1  
8 and 2 (ECF No. 64) to March 31, 2026, or alternatively March 24, 2026; and  
9 continuing the February 17, 2026 hearing for Plaintiff's Special Motion to Strike  
10 (ECF No. 61) to March 31, 2026 or alternatively March 24 or March 3, 2026.

11 **I. RELEVANT PROCEDURAL BACKGROUND**

12 The Complaint in this action was filed on June 3, 2025. On November 4, 2025, the parties  
13 appeared at an initial case management conference and a Case Management Scheduling Order  
14 was issued the same day fixing various timelines including discovery cut-off and fixing a trial  
15 date of February 1-2, 2027.

16 Both parties filed a number of motions thereafter:

- 17 a. Defendants' Motion to Dismiss under *FRCP* 12(b)(6) (ECF No: 43), granted in  
18 part and denied in part on January 23, 2026 (ECF No: 65);  
19 b. Plaintiff's Special Motion to Strike under Cal. Code Civ. Proc. § 425.16 (ECF  
20 No. 61) **on calendar for February 17, 2026;**  
21 c. Plaintiff's Motion to Dismiss Counts 1 and 2 (ECF No. 64) **on calendar for**  
22 **March 3, 2026;** and  
23 d. Plaintiff's Motion to Amend Case Management Order and Extending Deadline  
24 (ECF No. 66) **on calendar for March 31, 2026.**

25 On February 2, 2026, all of the Defendants retained the undersigned as their new counsel.

26 A motion to substitute was filed on February 3, 2026 and has been granted (ECF No: 72).

1 **II. ENLARGING DEADLINES FOR RESPONSE PAPERS FOR ECF NO: 64 and 66**

2 Prior to filing this administrative motion, Defendants' requested Plaintiff to stipulate to  
3 extending these two deadlines for the response papers (Declaration of Simon Lin, ¶ 2 and  
4 Exhibit 1, pp. 6 and 10):

- 5 a. For ECF No: 64 moving the deadline from February 6, 2026 to February 20, 2026
- 6 b. For ECF No: 66 moving the deadline from February 13, 2026 to February 20,  
7 2026

8 Plaintiff was agreeable to the first request for ECF No. 64 but not the second request for  
9 ECF No. 66 (Declaration of Simon Lin, Exhibit 1, p. 4). There is evidently no prejudice to the  
10 Plaintiff in the short extension of one week for ECF No: 66.

11 The primary reason for Defendants' request is that new counsel has just been retained,  
12 and is awaiting transfer of file materials. The undersigned also has a number of prior  
13 commitments for the remainder of this week and the beginning of next week, which would  
14 make it extremely difficult to meet a short deadline (Declaration of Simon Lin, ¶ 3).

15 Defendants request the deadline for their response papers for ECF Nos: 64 and 66 be  
16 enlarged to February 20, 2026.

17 **III. CONTINUING HEARING DATES FOR ECF NO: 64 and 61**

18 Defendants request to continue the hearing scheduled for March 3, 2026 (ECF No: 64).  
19 Plaintiff was *somewhat* agreeable to the continuation but insisted the hearing be continued to  
20 March 17, 2026 only. **However**, Plaintiff was already informed beforehand that the  
21 undersigned had prior commitments on both March 10 and 17, 2026 (Declaration of Simon  
22 Lin, Exhibit 1, p. 6). On March 17, 2026, the undersigned is appearing for a full day at a Court  
23 of Appeal hearing that was scheduled months ago, involving multiple counsel and cannot be  
24 changed (Declaration of Simon Lin, Exhibit 2).

25 Defendants request the hearing for ECF No. 64 be continued to March 31, 2026, the same  
26 day that ECF No. 66 is already on calendar. It would be most efficient for the Court to address

1 all motions on the same day rather than multiple motions back-to-back one week after another.  
2 Alternatively, the Defendants request the hearing be continued to March 24, 2026.

3 Defendants also request to continue the February 17, 2026 motion hearing for ECF No.  
4 61. The reason for this continuation is that the undersigned is not available on February 17,  
5 2026 due to a personal commitment that morning (Declaration of Simon Lin, ¶4). The  
6 undersigned's earliest availability is on March 3, 2026. It may be most efficient for this Court  
7 to continue this motion to March 31, 2026, the same date as ECF No. 66. Alternatively,  
8 Defendants request that the hearing for ECF No. 61 be continued to March 24, 2026 or March  
9 3, 2026.

10 For greater certainty, the Defendants are not seeking to enlarge the deadline for filing  
11 response papers to ECF No. 61, as the merits of the motion had already been resolved and is  
12 moot because of the voluntary dismissal that was already filed on the same day as ECF No.  
13 61. Defendants plan to briefly address mootness or provide any necessary clarifications in oral  
14 submissions, if this Court finds necessary. Alternatively, it may also be open to this Court to  
15 order supplemental briefings specific to the mootness topic only in lieu of or in addition to  
16 oral submissions.

17 **IV. CONCLUSION**

18 This Court should grant the Order, as detailed in the Proposed Order.

19 Respectfully submitted,

20 Date: February 3, 2026

By: Simon Lin

21 Simon Lin – State Bar No. 313661