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Attorney for Defendants Jonathan Hudon-Huneault, Nneka Ohiri, and 14693663 Canada Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER J. CORDOVA, Plaintiff, vs. JONATHAN HUDON-HUNEAULT, NNEKA OHIRI, 14693663 CANADA INC., Defendants.	Case Number: 5:25-cv-04685-VKD **DECLARATION OF JONATHAN HUDON-HUNEAULT ISO DEFENDANTS' MOTION FOR DISMISSAL FOR *FORUM NON CONVENIENS* OR ALTERNATIVELY POSTING OF A BOND PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE 1030** **Judge:** Magistrate Judge Virginia K. Demarchi **Complaint Filed**: June 3, 2025 **Trial Date**: February 1-2, 2027 (Bench Trial)

I, Jonathan Huneault, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath. I am providing this Declaration on behalf of 14693663 CANADA INC. and also my spouse Nneka Ohiri.

<u>Significant Family Inconvenience to Travel to California for Trial</u>

2. My wife, Ms. Nneka Ohiri, is currently four months pregnant with our third child and the baby is expected in August 2026. Assuming everything goes well we would have a very young infant in February 2027. Travelling with a very young infant, along with our two other children would be of significant inconvenience for our entire family.

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3. The pregnancy was discovered in or around early December 2025. Attached to this declaration as **Exhibit A.** is screenshot of the doctor's dictated report for Ms. Ohiri indicating the fetus was around 13 weeks and 1 day old on February 6, 2026. In other words, the fetus was conceived in or around November 6, 2025.

4. We also do not have friends or family that would be able to babysit our 3 children in California for the duration of the trial. Our parents and family members are elderly and would not be able to babysit our 3 children for multiple consecutive days and nights in Ontario should we have to be away to attend the trial in California. A flight to and from Ontario, Canada and California is approximately six hours each way.

All Production Work for the YouTube Channel Performed in Canada

5. All of the work for in relation to our YouTube channel, including recording of videos, editing of videos, and incorporation of any third-party videos, were all conducted from home in Canada.

Physicaladdress.com Mailbox Delivery Without a Suite Number

6. Attached to this declaration as **Exhibit B.** is an email I received from PhysicalAddress.com after I inquired with them over the phone on what happens to incoming mail that did not indicate a suite number, and also to obtain a physical copy of one piece of mail that I had received in or around August 2, 2023.

7. In the aforementioned email, the PhysicalAddress.com agent Kellie noted that:

> *As for your question on mail receival and missing suite numbers, if mail is received with no suite number, we would look up the name the item is addressed to in order to try and locate the account it belongs to. Please let us know if you have any further questions, and I hope you have a great day.*

8. Kellie also attached the scans of the USPS pickup notice of an item that the Plaintiff had attempted to send to me in August 2, 2023. I received the electronic notification from PhysicalAddress.com on August 2, 2023, which is attached to this declaration as **Exhibit C.**. This confirms that the lack of a suite number did not affect the delivery of mail that was addressed to me.

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Legal Expenses Paid to Date

9. Up to today, I have paid $46,000 Canadian dollars to defend this lawsuit.

Video Where Plaintiff Provided Consent

10. In or around July 24, 2022, the Plaintiff had participated on my live video shows. On that live video show, the Plaintiff led me to believe that I have permission to produce parody videos that incorporate portions of his videos.

a. A snippet of the aforementioned live video is found on a private video on one of my YouTube Channels at youtube.com/watch?v=YaYU8tXrDr4.

b. Attached to this declaration as **Exhibit D.** is a printout of the transcript for the aforementioned video that was generated by YouTube. The pertinent portion of the transcript is excerpted below (emphasis added):

> *And that that fighting for peace is like shouting for silence. So, um I as far as like going against you and being like, "Oh, I'm going to sue you." And all that kind of stuff, it's just that's just perpetuating it and making everything worse, I feel like. So, you know, I I don't have any problem with what you guys do. You guys do your own thing. You guys have your own your followers that that disagree with what we do, and that's fine. Um and I don't have anything against you guys. You know, you guys do what you do and and I do what I do. So, yeah. That's good. That's good.*

Video Where Plaintiff Claimed He Would Cost me $100,000

11. In or around June 2025, the Plaintiff published a video on his YouTube channel and discussed this lawsuit. This video has since been deleted by the Plaintiff.

a. A snippet of the aforementioned video is found on a private video uploaded to on one of my YouTube Channels at https://www.youtube.com/watch?v=nlyjHL98_YA. This snippet was uploaded to YouTube for the sole purpose of presenting this evidence to the Court.

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b. Attached to this declaration as **Exhibit E.** is a printout of the transcript for the aforementioned video that was generated by YouTube. The pertinent portion of the transcript is excerpted below (emphasis added):

> *Um, I don't know if he spoke to an attorney. I feel like he's probably just not going to acknowledge it. He's just going to accept the default judgment.*
>
> *That's kind of the way it seems like it's going right now. Um, he's just going to say screw it. Cuz I mean, he's going to have to pay it would probably take him 10 $15,000 to put down as a retainer if he wants to fight this. And then, you know, after litigation, everything, you know, it's going to take a couple years all said and done, he might pay 100,000. So, he's going to spend more money defending He's going to spend more money defending this one video than he's made on his entire channel since he started it, basically.* [chuckles]

Video Where Plaintiff Admitted Living in Poverty

12. In or around February 28, 2026, the Plaintiff published a video on his YouTube channel and discussed this lawsuit. Until the date of signing this declaration, the video is still accessible on the Plaintiff's YouTube channel at https://www.youtube.com/watch?v=Tym7mOTgED8.

a. A snippet of the aforementioned video is found on a private video uploaded to one of my YouTube Channels at https://www.youtube.com/watch?v=UvY_0JWFIQM. This snippet was uploaded to YouTube for the sole purpose of presenting this evidence to the Court.

b. Attached to this declaration as **Exhibit F.** is a printout of the transcript for the aforementioned video that was generated by YouTube. The pertinent portion of the transcript is excerpted below (emphasis added):

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> *So for the people who aren't smart enough to, you know, put the pieces together and figure it out, yes, he is on a contingency basis. I have not paid him a single dollar. So he's not making he's losing money. Not only is he on a contingency basis, he's paid for almost all of the filings on my cases. Okay? I paid for one, maybe two. I know I paid for one for sure. I might have paid for two. So I'm like $400, maybe $800 in.*
>
> *He's paid for every other filing. He's thousands of dollars he's in on this. So, he's not making a whole bunch of money. That's why we vibrate on the same frequency. He doesn't care about money. Just like the the trolls say, "Oh, you just care about money." What money? <u>That I live in poverty</u>. <u>Ever since I've started becoming a full-time YouTube creator, [laughter] that I literally live in poverty now</u>. Is that the money you're talking*

<u>Better Quality Version of Video from November 24, 2025 Declaration</u>

13. Further to my declaration on November 24, 2025, regarding the link to Defendant's video on the top of page 3 of that declaration, I just uploaded a cropped version that only depicted the video itself and not the browser or desktop background. It has been uploaded to one of my YouTube Channels at https://www.youtube.com/watch?v=DmhEL45mic0. This video was uploaded to YouTube for the sole purpose of presenting this evidence to the Court.

14. Further to my declaration on November 24, 2025 at paragraph 6, I no longer have access to the video referred to therein. To the best of my recollection, I produced that video in a very similar fashion as the video that I described in detail in the declaration on November 24, 2025. As noted in paragraph 4 of the declaration on November 24, 2025, I always carefully add memes, sound effects, commentary, and other background audio.

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

Executed this 10th day of March 2026.

Jonathan Hudon-Huneault

Jonathan Hudon-Huneault

Doc ID: 9b39cb08e7477e415732eda03b046a2b1916cfe2

EXHIBIT A

FINDINGS:
There is a single viable intrauterine gestation. Fetal cardiac activity is noted (137 bpm).

FETAL ANATOMY:
Nuchal translucency measures 1.3 mm. Head shape appears normal. The nasal bone is visualized. A normal appearing three-vessel cord insertion is documented. The stomach, bladder and all 4 extremities are identified. Other structures are not assessed at this time.

GROWTH PARAMETERS:
CRL: 76.8 mm (13 weeks 1 day)
BPD: 24 mm

Estimated gestational age is 13 weeks 1 day, plus or minus 1 week.

Left posterior wall calcified fibroid measuring 2.4 x 2.3 x 2.2 cm.

The cervix is closed and measures 5 cm transabdominally.

IMPRESSION:
Single fetus with average ultrasound age of 13 weeks 1 day, plus or minus 1 week.

A scan for fetal morphology is suggested at around 19 to 20 weeks.

Report Status: Signed
Dictated By: I
Electronically
Dictated Date/Time (DD/MM/YY): 06/02/26 1212
Transcribed Date/Time (DD/MM/YY): 06/02/26 1214

EXHIBIT B

Simon Lin <simonlin@evolinklaw.com>

Fwd: New User and Form 1583 Follow-Up

Frauditor Troll <frauditortroll@gmail.com> Fri, Mar 6, 2026 at 1:47 PM
To: Simon Lin <simonlin@evolinklaw.com>

---------- Forwarded message ---------
From: **Nneka Ohiri** <nnekasluxurynatural@gmail.com>
Date: Fri, Mar 6, 2026, 4:45 p.m.
Subject: Fwd: New User and Form 1583 Follow-Up
To: Frauditor Troll <frauditortroll@gmail.com>

---------- Forwarded message ---------
From: **Kellie Wooten** <support@physicaladdress.com>
Date: Fri, Mar 6, 2026, 4:43 p.m.
Subject: Re: New User and Form 1583 Follow-Up
To: <nnekasluxurynatural@gmail.com>

Hi Jonathan,

It was wonderful speaking with you! Here is a screenshot of the item which was uploaded into your account before it was closed.

UNITED STATES POSTAL SERVICE

2324242

Download Informed Delivery to manage your mail

Sorry we missed you while you were out.

Date: 8/2/23

The item was sent by: C. CORDOVA

It was sent to: JONATHAN HUNERALT

At this address: 99 WALL ST

About the missed delivery:

It was a:

____Package ✓ Letter ____Large envelope

☐ Parcel Locker Eligible

Available for pickup date: 8/3/23

This is the:

☒ First attempt ☐ Final notice

To Schedule a Redelivery:

Scan the QR Code or go to usps.com/redelivery

Article Number:

5293 0628 8566 6293

We have item/s for you which we could not deliver because:

☐ It requires a payment of $_____ for:

____Postage due ____Customs

☐ Receptacle full/item oversized

☐ No secure location available

☐ No authorized recipient available

☐ Signature required

___must be 18+ years old___must be 21+ years old

☒ Other: RESTRICTED DELIVERY

Please see reverse to schedule redelivery or pickup.

PS Form 3849, February 2021

Choose one option for redelivery or pickup.

1. Go online to usps.com/redelivery.
2. Parcel Locker Delivery (optional) If Parcel Locker Eligible is checked on the front of the form, you may request the pickup of your items at **uspsparcellocker.com/pickup**. Your items will be delivered to the parcel locker located at the address listed in section 4.
3. Let your carrier know when and where you'd like them to leave the item, then leave this form in your mailbox.
   (Sorry, not an option for Restricted Delivery or Adult Signature items)

   Please redeliver on this date: _____ and leave at (check one):

   ☐ Front door ☐ Back door ☐ Porch ☐ Garage

   ☐ Other: _____
4. Go to your local Post Office™, located at:

   WALL STREET STATION
   90 CHURCH ST (WEST B'WAY ENTRANCE)
   NEW YORK, NY 10007-9998
   MON-FRI 9AM-5PM & SAT 9AM-1PM
5. Sign up to manage your redeliveries at informeddelivery.com.
6. Send someone to serve as your representative: Sign below and provide the name of the person you want to pick up your item at your local Post Office listed in section 4. See option 3 for restrictions.

   Addressee signature: _____

   Name of representative: _____
7. Call us at 800-ASK-USPS (800-275-8777).

Delivery Section

Signature X	
Printed Name	
Delivery Address	99 WALL ST

USPS

5293 0628 8566 6293

We Re Deliver for You!

PS Form 3849, February 2021 (Reverse)

UNITED STATES POSTAL SERVICE ©

As for your question on mail receival and missing suite numbers, if mail is received with no suite number, we would look up the name the item is addressed to in order to try and locate the account it belongs to. Please let us know if you have any further questions, and I hope you have a great day.

All the best,
Kellie, Client Success Agent
PhysicalAddress.com

On Mon, 14 Nov, 2022 at 2:31 PM , Nicole Reynolds <support@physicaladdress.com> wrote:

Hi Jonathan,

Thank you for submitting your USPS 1583 form. I have successfully processed it to your account. Now any mail that we receive will be scanned and uploaded to your account. If you have any questions, please call us M-F, 6AM-7PM or Sat-Sun 10-2PM pacific standard time: +1 (844) 888-6364. You can also contact us through the Help link inside your PhysicalAddress.com account.

Thanks again for choosing PhysicalAddress.com!

All the best,
Nicole

On Sun, 13 Nov at 4:40 PM , Jonathan Huneault <nnekasluxurynatural@gmail.com> wrote:
New User created requiring Form 1583

Doc ID: 9b39cb08e7477e415732eda03b046a2b1916cfe2

EXHIBIT C

4:22 Uber 73%

PhysicalAddress.com has added new mail to your inbox

Inbox

mailnotific... 8/2/2023

to me

PhysicalAddress.com has added
1 new pieces of mail to your VirtualizedMail Inbox

2324242 UNITED STATES POSTAL SERVICES

Reply | Reply all | Forward

99+

Doc ID: 9b39cb08e7477e415732eda03b046a2b1916cfe2

EXHIBIT D

0:00

I got u another request. Can we watch a different one? Let's do the of course the I do while I have you on here. So let

0:08

8 seconds

let's just address a few things cuz I you know it's rare that we get a chance to talk. We've never spoken uh you know

0:15

15 seconds

as face to face as it's going to get. So are you serious about the lawsuit? You can't be right. There's no way you are.

0:22

22 seconds

Dude, you know I don't know. Well, I actually did talk to my attorney about it and and I just brought it up to him and he said, "Well, we need to get his last name so we can do a cease and desist."

0:31

31 seconds

And I was like, "Okay, that's that's fine." And um you know, I don't know. I haven't really been talking to him about it. So, he said, "We need to get your last name." And that's the last I heard.

0:42

42 seconds

I I don't think I'm really going to pursue it. Like you said, you only sold two shirts and it was me and you. The only one bought it. So, you're better off to ask for a refund,

0:50

50 seconds

but I don't think that would qualify because you're a satisfied customer, dude. I'm a satisfied customer, man. Yeah. Um,

0:56

56 seconds

that's awesome. That's going in my intro for sure.

0:58

58 seconds

Yeah, dude. Um, you know what? It's like, uh, it's I kind of lost my ways a little bit because I was, you know, I I preach a lot on my my spiritual channel that what you resist persists, right?

1:10

1 minute, 10 seconds

And that that fighting for peace is like shouting for silence. So, um I as far as like going against you and being like,

1:18

1 minute, 18 seconds

"Oh, I'm going to sue you." And all that kind of stuff, it's just that's just perpetuating it and making everything worse, I feel like. So, you know, I I don't have any problem with what you

1:26

1 minute, 26 seconds

guys do. You guys do your own thing. You guys have your own your followers that that disagree with what we do, and that's fine. Um and I don't have

1:34

1 minute, 34 seconds

anything against you guys. You know, you guys do what you do and and I do what I do. So, yeah. That's good. That's good.

EXHIBIT E

Um, I don't know if he spoke to an attorney. I feel like he's probably just not going to acknowledge it. He's just going to accept the default judgment.

0:06

6 seconds

That's kind of the way it seems like it's going right now. Um, he's just going to say screw it. Cuz I mean, he's going to have to pay it would probably

0:14

14 seconds

take him 10 $15,000 to put down as a retainer if he wants to fight this. And then, you know, after litigation,

0:22

22 seconds

everything, you know, it's going to take a couple years all said and done, he might pay 100,000. So, he's going to spend more money defending He's going to

0:30

30 seconds

spend more money defending this one video than he's made on his entire channel since he started it, basically.

EXHIBIT F

0:00

So for the people who aren't smart enough to, you know, put the pieces together and figure it out, yes, he is on a contingency basis. I have not paid

0:08

8 seconds

him a single dollar. So he's not making he's losing money. Not only is he on a contingency basis, he's paid for almost

0:16

16 seconds

all of the filings on my cases. Okay? I paid for one, maybe two. I know I paid for one for sure. I might have paid for two. So I'm like $400, maybe $800 in.

0:26

26 seconds

He's paid for every other filing. He's thousands of dollars he's in on this.

0:32

32 seconds

So, he's not making a whole bunch of money. That's why we vibrate on the same frequency. He doesn't care about money.

0:37

37 seconds

Just like the the trolls say, "Oh, you just care about money." What money? That I live in poverty. Ever since I've started becoming a full-time YouTube creator, [laughter]

0:47

47 seconds

that I literally live in poverty now. Is that the money you're talking