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4

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

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

8 CHRISTOPHER J. CORDOVA,)

9 Plaintiff,)

10 vs.)

11 JONATHAN HUDON-HUNEALT,)
12 NNEKA OHIRI, 14693663 CANADA INC.,)

13 Defendants.)
14)
15)
16)
17)
18)
19)
20)
21)
22)

) Case Number: 5:25-cv-04685-VKD

) **DECLARATION OF JONATHAN**
) **HUDON-HUNEALT ISO**
) **DEFENDANTS’ ADMINISTRATIVE**
) **MOTION TO TEMPORARILY STAY**
) **DISCOVERY PENDING DISPOSITION**
) **OF DEFENDANTS’ MOTION (ECF No.**
) **91), AND TEMPORARILY DEFER**
) **RULING ON PENDING MOTIONS (ECF**
) **Nos. 61, 64)**

) **Judge:** Magistrate Judge Virginia K.
) Demarchi

) **Complaint Filed:** June 3, 2025

) **Trial Date:** February 1-2, 2027 (Bench Trial)

23 I, Jonathan Huneault, do hereby declare as follows:
24

25 1. I have personal knowledge of the facts set forth in this Declaration and, if called
26 as a witness, could and would testify competently to such facts under oath. I am providing
27 this Declaration on behalf of 14693663 CANADA INC. and also my spouse Nneka Ohiri.
28

1 **Requests for Production and Requests for Admission from Plaintiff**

2 2. I understand my former counsel, Mr. Steve Vondran, has responded to the
3 following Requests for Admissions from the Plaintiff in or around January 2026:

- 4 a. Jonathan Hudon-Huneault: 142 requests for admissions
- 5 b. 14693663 Canada Inc.: 51 requests for admissions
- 6 c. Nneka Ohiri: 96 requests for admissions

7
8 3. I understand my former counsel, Mr. Steve Vondran, has responded to the
9 following Requests for Production from the Plaintiff in or around January 2026:

- 10 a. Jonathan Hudon-Huneault: 135 requests for production
- 11 b. 14693663 Canada Inc.: 20 requests for production
- 12 c. Nneka Ohiri: 56 requests for production

13
14 **Plaintiff's Deletion of Evidence**

15
16 4. Attached to this declaration as **Exhibit A.** is a webpage on a third-party website
17 ReallyCoolNews dated July 19, 2025 at [http://reallycoolsite.org/denver-metro-audits-](http://reallycoolsite.org/denver-metro-audits-explains-fair-use-practices)
18 [explains-fair-use-practices](http://reallycoolsite.org/denver-metro-audits-explains-fair-use-practices) that includes an article describing the Plaintiff's filing of this
19 lawsuit, and embeds a YouTube video from the Plaintiff's YouTube account where the
20 Plaintiff explains his understanding of the fair use defense.

21 5. Attached to this declaration as **Exhibit B.** is a screenshot made on March 11,
22 2026 showing that the Plaintiff has deleted the aforementioned video from his YouTube
23 account. The error message indicates that "*This video has been removed by the uploader.*"

24 6. Before the filing of this lawsuit, and since the filing of this lawsuit, the Plaintiff
25 has published many videos on YouTube relating to this lawsuit, including describing his
26 understanding of fair use, his legal position, and his motivation and intention for this
27 lawsuit. I have viewed most of these videos and they appear to me to be relevant to this
28 lawsuit.

1 7. Since on or around March 6, 2026, I discovered that many of the videos relating
2 to this lawsuit have been deleted, including the video described in paragraphs 4-5 above.

3 8. Attached to this declaration as **Exhibit C.** is a screenshot of the YouTube
4 channel statistics for the Plaintiff's @DenverMetroAudits account. The screenshot shows
5 that he deleted eight (8) videos on March 3, 2026 and ten (10) videos on March 4, 2026.

6 9. Attached to this declaration as **Exhibit D.** is a screenshot of the YouTube
7 channel statistics for the Plaintiff's @DenverMetroAudits2.0 account. The screenshot
8 shows that he deleted eighteen (18) videos on March 4, 2026.

9
10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed this 12th day of March 2026.

13 *Jonathan Hudon-Huneault*

14 _____
15 Jonathan Hudon-Huneault
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EXHIBIT A



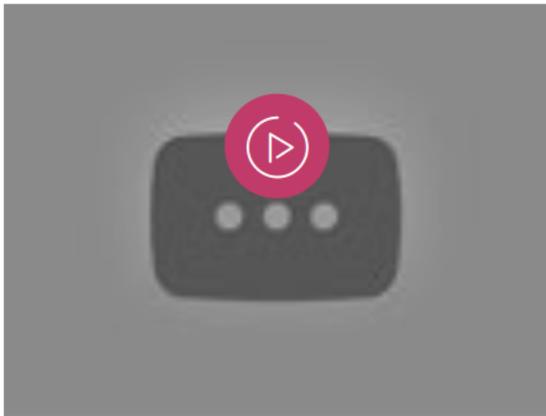
Denver Metro Audits Explains Fair Use Practices

by **Jim** — July 19, 2025 in **News** Reading Time: 4 mins read 244 18 AA 0

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Saturday saw a new announcement from Christopher “Denver Metro Audits” Cordova and that Randall S. “The Unhinged Attorney” Newman, Esq., that they have made good on previous threats and gone ahead and sued “the Exposer” of 1a Audits Exposé fame and his attorney, Lee Rapkin.

The lawsuit is the first to feature Cordova’s holding company, Executive Lens, as the plaintiff in the suit with Rapkin being targeted by the suit as she filled out the single counter DMCA notice for all the videos in question, taking responsibility for acceptance of service of the lawsuit.

At issue are 17 videos removed by YouTube, which account for 17 strikes against the 1a Audits Exposé channel, and consist of 16 shorts and a long form video. 1a Audits Exposé voluntarily took his channel down earlier in the month, to set it on “pause” as he explores other interests.

It is unclear if YouTube sanctioned the channel or took the channel down because of this, as 1a Audits Exposé had claimed that there was pending action by the corporation against his channel on the Monday following his voluntary removal of said channel.

Attorney Rapkin is targeted as a defendant in the lawsuit as she filed the DMCA counter notice and claimed that she was responsible for the contents of the channel. Instead of disputing each claim with individual counterclaims, she filed one document containing a single response for all 17 claims.

In her response, she defends the short form videos as fair use, despite the lack of verbal content or reactions by The Exposer himself. The videos typically feature a short clip taken from one of Cordova’s videos, followed by a reaction to that clip using other copyrighted works, such as short clips from TV shows such as ‘The Office.’

YouTube had sided with the plaintiffs by removing all 16 of the shorts, deeming them in violation of the fair use policy. Rapkin's response claims that the removal was in error and that the videos "significantly transformed by detailed editing and elaborate commentary throughout."

Despite failing to raise the \$405.00 they previously announced they needed to file with the GoFundMe associated with the lawsuit, they found the money to move forward with the suit.

Cordova and Newman announced their new lawsuit on a Saturday livestream on Newman's The Unhinged Attorney YouTube channel, with the pair again indicating that they're moving forward with the registration of Cordova's videos and more lawsuits.

During the livestream, the pair went over their lawsuit against the defendants then provided an example of a video that they said properly demonstrates "fair use." They played a video made famous from the Hosseinzadeh v. Klein case, a lawsuit that was ultimately won by the defendants and established that the defendants did not violate "fair use" guidelines.

With permission from the attorney for Ethan Kline, the pair played the video at the heart of that lawsuit. The video featured defendants Ethan and Hila Klein appearing on camera during the video and featured their reactions to a video produced by Matt Hosseinzadeh, a parkour YouTuber.

The Kleins use approximately 30 second clips of the video at a time, pausing to give commentary about what they just witnessed. More often than not their commentary, which is given while the video is stopped, is longer than the clip they just watched as they provide feedback on the video.

According to Newman and Cordova, this Court essentially established this as a "fair use" template for others to use when producing videos.

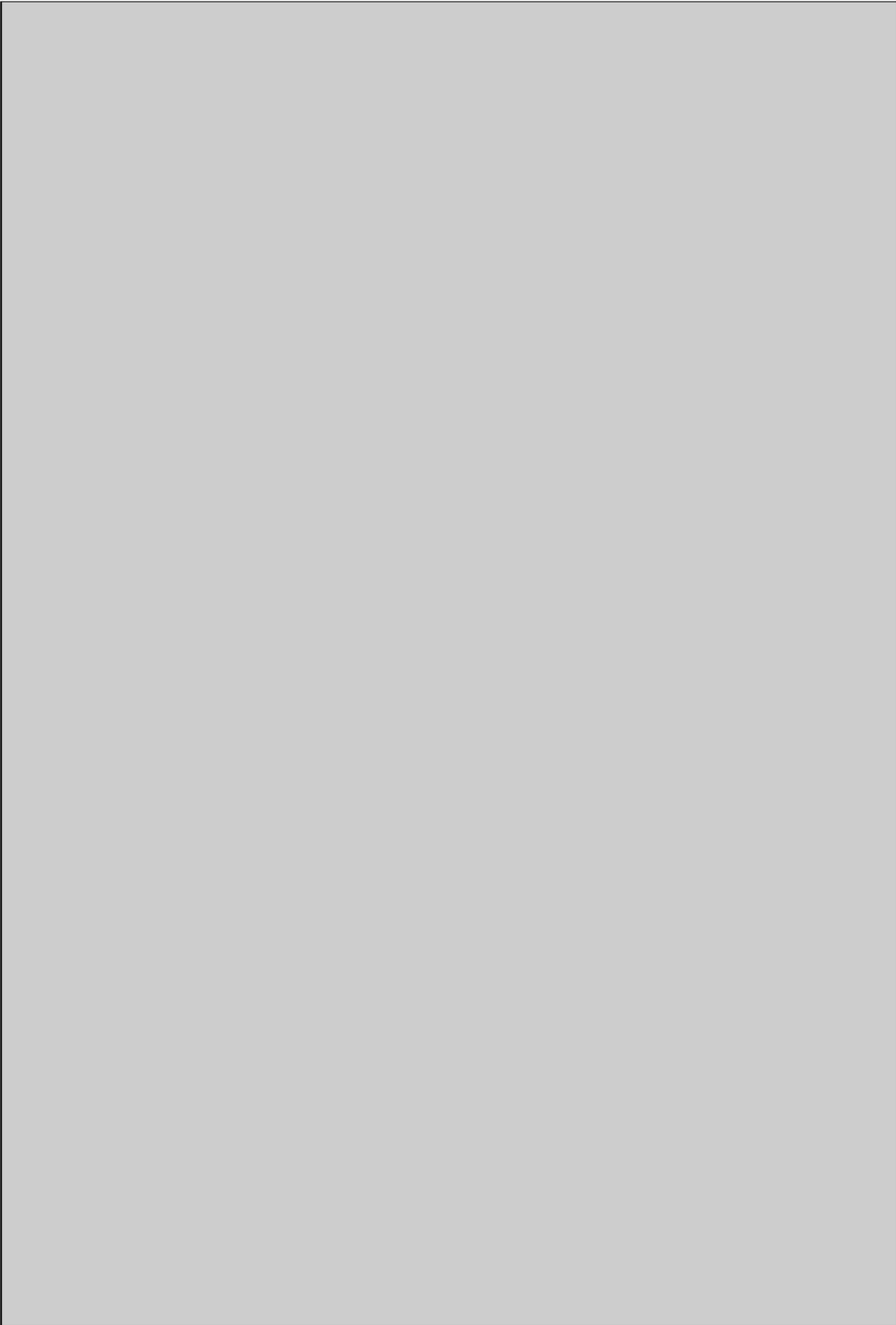
Cordova also addressed the continuing statements by community members that he was simply using the lawsuits to silence critics and prevent the use of any of the videos from his channel in reaction videos.

The YouTuber said that this was not the case, as he was fine with the use of his videos as long as they're used in a transformative manner. He and Newman had previously stated that such channels as Lucid's Lair properly break down their videos and do not provide a "market substitute" for the original video as they keep the usage of footage to a minimum and provide original extensive original commentary between clips.

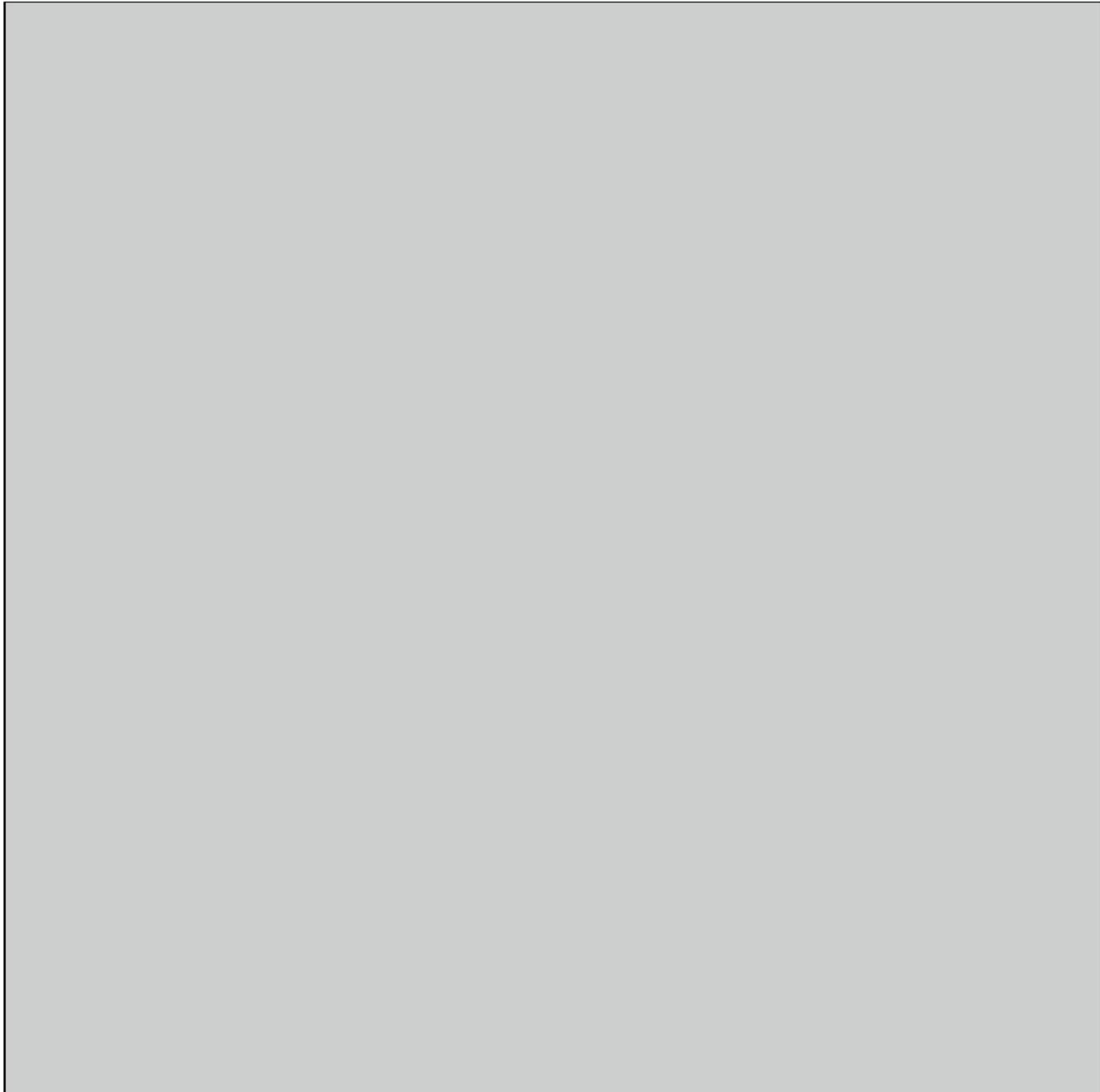
They also cited Flat Derp's videos, which typically use audio from other videos to produce new animated content, to be both funny and fine to use. Derp essentially uses the audio footage to create an entirely new work based on the original, without duplicating the material from the original.

The pair also announced that they were in the process of acquiring rights to the video catalog of the JC News Now channel, which will also be used for future lawsuits once they begin to register the copyright from videos in the catalog.

Cordova, through Newman, is seeking monetary damages, a declaratory judgment that The Exposer's use of the 17 Videos is not protected by 17 U.S.C. § 107, and a permanent injunction preventing the Exposer or YouTube from returning the videos in question to the service.



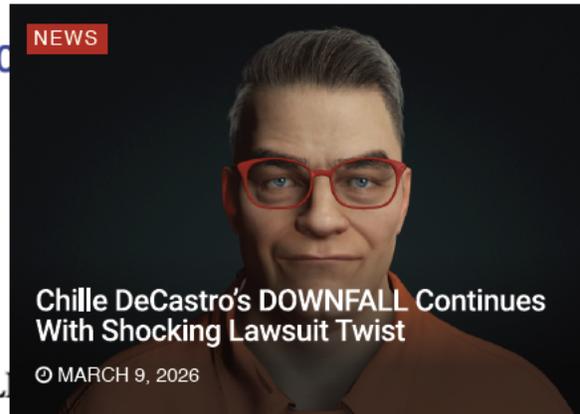
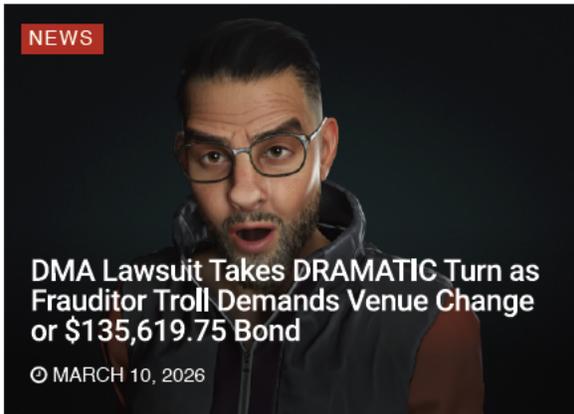
1 RANDALL S. NEWMAN (SBN 190547)
2 Attorney at Law
3 99 Wall St., Suite 3727
4 New York, NY 10005
212.797.3735



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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
Northern District of California

EXECUTIVE LENS LLC

Plaintiff(s)

v.

LEE RAPKIN and JOHN DOE dba "the Exposer"
www.youtube.com@1aAuditsExposé

Defendant(s)

Civil Action No. 5:25-cv-06048-NC

Save my name, email, and website in this browser for the next time I

comment.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Lee Rapkin
BLP Avocats
439, rue Saint-Pierre
Montréal (Québec) H2Y 2M8

Home / Animal Needs Campaign / CashApp / GoFundMe / PayPal / StreamElements

Call us: +1 234 JEG THEME

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EXHIBIT B

reallycoolsite.org/denver-metro-audits-explains-fair-use-practices/

by **Jim** — July 18, 2025 in **News** Reading Time: 4 mins read 243 19 AA 0

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Saturday sav
they have made good on previous threats and gone ahead and sued “the Exposer” of 1a Audits Exposé fame and his attorney, Lee Rapkin.
The lawsuit is the first to feature Cordova’s holding company, Executive Lens, as the plaintiff in the suit with Rapkin being targeted by the suit as she

Esq., that

EXHIBIT C

DENVER METRO AUDITS

Denver Metro Audits @denvermetroaudits

Subscribers: 240K | Views: 133,377,687 | Videos: 817 | Created On: July 31, 2021

View on YouTube

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Channel Statistics | Video Statistics | Future Projections | Similar Channels | Live Subscriber Count | Achievements | Compare

C
Grade

612,366th

SB Rank

2,078th

Subscribers Rank

219,267th

Views Rank

1,833rd

US Rank

1,869th

Entertainment Rank

CREATOR STATISTICS

0

Subscribers for the last 30 days

728K

Views for the last 30 days

\$182 - \$2.9K

Monthly Estimated Earnings

\$8.1K - \$129K

Yearly Estimated Earnings

GAINED SUBSCRIBERS (WEEKLY)

GAINED VIEWS (WEEKLY)

RECENT VIDEO

You must be logged in to use this feature.

Login

Daily Channel Metrics Last 14 Days ↕

Date	Subscribers	Views	Videos	Estimated Earnings
Fri 2026-02-27	240K	+42,676	830	\$11 - \$171
Sat 2026-02-28	240K	+41,168	832	\$10 - \$165
Sun 2026-03-01	240K	+25,596	832	\$6 - \$102
Mon 2026-03-02	240K	+30,093	834	\$8 - \$120
Tue 2026-03-03	240K	-133,918	826	\$0 - \$0
Wed 2026-03-04	240K	+10,889	816	\$3 - \$44
Thu 2026-03-05	240K	-11,230	816	\$0 - \$0
Fri 2026-03-06	240K	+15,268	817	\$4 - \$61

EXHIBIT D



Denver Metro Audits™ 2.0 @denvermetroaudits2.0

View on YouTube

Subscribers 15.2K Views 4,654,296 Videos 200 Created On June 16, 2022

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Channel Statistics Video Statistics Future Projections Live Subscriber Count Achievements

Compare

C- Grade	1,161,183rd SB Rank	3,066th Subscribers Rank	2,531,731st Views Rank	2,821st US Rank	TBD Category Rank
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CREATOR STATISTICS

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GAINED SUBSCRIBERS (WEEKLY)



0 Subscribers for the last 30 days	-1.5K Views for the last 30 days	\$0 - \$0 Monthly Estimated Earnings	\$80 - \$1.3K Yearly Estimated Earnings
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GAINED VIEWS (WEEKLY)



Daily Channel Metrics

Last 14 Days

Date	Subscribers	Views	Videos	Estimated Earnings
Fri 2026-02-27	-- 15.2K	+44 4,663,931	+1 217	\$0 - \$0
Sat 2026-02-28	-- 15.2K	+201 4,664,132	+1 218	\$0 - \$1
Sun 2026-03-01	-- 15.2K	+41 4,664,173	-- 218	\$0 - \$0
Mon 2026-03-02	-- 15.2K	+42 4,664,215	-- 218	\$0 - \$0
Tue 2026-03-03	-- 15.2K	+37 4,664,252	-- 218	\$0 - \$0
Wed 2026-03-04	-- 15.2K	+17 4,664,269	-18 200	\$0 - \$0
Thu 2026-03-05	-- 15.2K	-13,889 4,650,380	-- 200	\$0 - \$0
Fri 2026-03-06	-- 15.2K	+3,510 4,653,890	-- 200	\$1 - \$14
Sat 2026-03-07	-- 15.2K	+205 4,654,095	-- 200	\$0 - \$1
Sun 2026-03-08	-- 15.2K	+205 4,654,095	-- 200	\$0 - \$0

RECENT VIDEO

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