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

11 CHRISTOPHER J. CORDOVA,

12 Plaintiff,

13 vs.

14 JONATHAN HUDON-HUNEULT,
 15 NNEKA OHIRI, 14693663 CANADA
 16 INC.,

17 Defendants.
 18
 19

Case No. 25-cv-04685-VKD

HON. VIRGINIA K. DEMARCHI

**DECLARATION OF RANDALL S.
 NEWMAN IN OPPOSITION TO
 DEFENDANTS' ADMINISTRATIVE
 MOTION**

DECLARATION OF RANDALL S. NEWMAN

1
2 I, Randall S. Newman, hereby declare pursuant to 28 U.S.C. § 1746 that the
3 following is true and correct:

4 1. I am an attorney duly licensed to practice before this Court and am the attorney
5 for Plaintiff Christopher J. Cordova (“Plaintiff”). Unless otherwise stated, I have personal
6 knowledge of the facts stated herein and if called as a witness could competently testify
7 thereto.

8 2. Plaintiff originally commenced this action on June 3, 2025 against Defendant
9 Jonathan Hudon-Huneault (“Huneault”) in connection with the YouTube channel located
10 at <https://www.youtube.com/@frauditortroll> (the “Frauditor Troll Channel”). (ECF No. 1).

11 3. Shortly after the lawsuit was filed, Plaintiff provided Defendants with notice
12 of the action via email.

13 4. After receiving notice of this lawsuit, Defendant began deleting videos from
14 the Frauditor Troll Channel.

15 5. On June 21, 2025, Plaintiff filed an Ex Parte Application for a Preservation
16 Order seeking to ensure that the relevant videos and related electronically stored
17 information (“ESI”) were preserved. (ECF No. 8).

18 6. The Court denied the application but noted that Huneault had “an existing and
19 well-established preservation obligation” and that failure to comply with that obligation
20 could result in sanctions. (ECF No. 10).

21 7. On October 28, 2025, the parties filed a Joint Case Management Statement.
22 (ECF No. 37). In that filing, Defendants acknowledged that the Court had subject matter
23 jurisdiction and that venue and personal jurisdiction were proper in the Northern District
24 of California.

25 8. On November 3, 2025, Plaintiff filed a First Amended Complaint (the “FAC”).
26 (ECF No. 39). In the FAC, Plaintiff alleged that Defendants unlawfully obtained between
27 fifty and one hundred of Plaintiff’s works and reuploaded them to Defendants’ YouTube
28 channels with minimal transformation but that the precise number could not be determined

1 due to Defendants’ unilateral destruction of that evidence. (FAC ¶ 34, fn. 3).

2 9. Plaintiff served written discovery on Defendants on November 14, November
3 17, and November 26, 2025. These discovery requests sought, among other things, copies
4 of ALL the videos Defendants created using Plaintiff’s copyrighted works and related
5 metadata and ESI. Plaintiff also sought the titles of ALL the videos Defendants created
6 using Plaintiff’s copyrighted works.

7 10. Defendants served discovery responses on December 23, 2025. Defendants’
8 discovery responses contained numerous objections and did not produce the requested
9 videos.

10 11. In those responses, Defendants admitted that approximately 1,700 videos
11 from the “Frauditor Troll” YouTube channel had been deleted and that no copies or related
12 ESI had been retained. As discussed above, between fifty and one hundred of those deleted
13 videos contained footage that Defendants unlawfully obtained from Plaintiff’s YouTube
14 channel that infringed on Plaintiff’s works.

15 12. Because Defendants had deleted the videos and related ESI, on or about
16 January 2, 2026, Plaintiff served a Rule 45 subpoena on Google seeking copies of the
17 deleted videos and related ESI.

18 13. Google’s outside counsel informed Plaintiff that the deleted videos and related
19 ESI were no longer available due to Google’s data retention policies in which deleted
20 videos and related data is retained for approximately 30 days.

21 14. On January 23, 2026, Defendants served supplemental discovery responses
22 and withdrew the majority of their improper objections.

23 15. On the same day, the Court issued its order granting in part and denying in
24 part Defendants’ motion to dismiss. (ECF No. 65).

25 16. On January 31, 2026, Defendants’ prior counsel, attorney Steven Vondran,
26 sent an email stating that he would be sending Defendants’ “initial bates stamped doc
27 responses” and that certain files, including videos and images, could not be Bates stamped.

28 17. On February 2, 2026, attorney Simon Lin contacted me and advised that he

1 would be substituting in as counsel for Defendants.

2 18. Shortly after receiving that email, I spoke with Mr. Vondran by telephone.
3 During that conversation, Mr. Vondran advised that he was in the process of sending
4 Defendants' discovery materials to Mr. Lin and that the production consisted of more than
5 1,000 pages of Bates-numbered documents as well as numerous videos.

6 19. On February 23, 2026, I requested a meet-and-confer with Mr. Lin regarding
7 an anticipated motion under Rule 37(e) based on Defendants' deletion of relevant ESI after
8 receiving notice of the lawsuit.

9 20. Mr. Lin *refused* to participate in a meet-and-confer unless Plaintiff first
10 identified the specific videos that had been deleted.

11 21. Because Defendants had deleted the relevant material, Plaintiff was unable to
12 identify every infringing video at that time.

13 22. On March 5, 2026, Defendants finally produced documents in response to
14 Plaintiff's November 2025 discovery requests.

15 23. The production consisted of fewer than 300 pages of documents. Huneault
16 produced 283 pages of documents, Nneka Ohiri produced 6 pages of documents and
17 14693663 CANADA INC. produced 8 pages of documents.

18 24. Notably, Defendants *did not produce a single video*, including the videos
19 specifically referenced in the First Amended Complaint.

20 25. The videos at issue constitute the central evidence in this copyright case.

21 26. Defendants also did not produce metadata or any list identifying the titles of
22 videos that incorporated Plaintiff's copyrighted works.

23 27. On March 11, 2026, Defendants filed a motion seeking dismissal based on
24 forum non conveniens or, alternatively, an order requiring Plaintiff to post security for
25 costs.

26 28. On March 12, 2026, Defendants asserted that their document production was
27 complete.

28 29. Defendants also requested that Plaintiff identify the specific videos sought in

1 discovery.

2 30. Also on March 12, 2026, Plaintiff became aware that a third-party YouTube
3 creator had compiled a partial list of video titles that previously appeared on Defendants'
4 Frauditor Troll YouTube channel.

5 31. Based on that information, Plaintiff has now been able to identify
6 approximately 67 videos that appear to contain Plaintiff's copyrighted footage. A copy of
7 the list of videos is attached hereto as Exhibit "A".

8 32. These videos correspond to the allegations in the FAC that Defendants created
9 between fifty and one hundred infringing videos incorporating Plaintiff's work.

10 33. On March 13, 2026, Defendants filed the Administrative Motion seeking to
11 stay discovery and defer ruling on Plaintiff's pending motions. (ECF No. 94).

12 34. That same day, Defendants served Plaintiff with a Notice of Subpoena
13 regarding a Rule 45 subpoena on Google seeking videos Plaintiff purportedly deleted from
14 his YouTube channel.

15 35. The videos Defendants seek were not deleted but were set to "private" and
16 Plaintiff has retained all relevant ESI in accordance with his preservation obligations.

17 36. As of the date of this declaration, Defendants have not produced copies of the
18 infringing videos identified in the FAC or any of the videos identified through the third-
19 party compilation that incorporated footage unlawfully obtained from Plaintiff's YouTube
20 channel.

21 37. Moreover, because Mr. Lin refuses to participate in a meet-and-confer
22 regarding Plaintiff's potential Rule 37(e) motion for spoliation sanctions, it is unclear
23 whether Defendants possess the videos and ESI and are withholding their production or
24 whether that information no longer exists because it was permanently deleted after notice
25 of this lawsuit.

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

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1 Executed on this 16th day of March, 2026.

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3 s/ Randall S. Newman

4 Randall S. Newman
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TITLE OF DEFENDANTS' VIDEO INCORPORATING PLAINTIFF'S FOOTAGE

- 1 Angry Crowd RETALIATES Against DMA and Karens
- 2 Calling out DMA the COWARD
- 3 CITIZENS RETALIATE AGAINST FRAUDITORS!!! DMA, KAREN AND CREW OWNED!!!
- 4 Clown Lashes Out at his Subscribers #*
- 5 Creepy Frauditor gets Roasted by Hilarious Officer
- 6 Denver Frauditor Cries when Officer Touches his Camera
- 7 DMA +4 FRAUDITORS ARRESTED!!!
- 8 DMA and Karen Lie and E-Beg
- 9 DMA and Karen try to FRAME Officer
- 10 DMA and News Now Ninja tried to FRAME Me
- 11 DMA Cries after getting Doxed by Police
- 12 DMA DETAINED
- 13 DMA gets Feeling Hurt and has a Tantrum
- 14 DMA gets ROASTED at the DMV
- 15 DMA gets ROASTED at the DMV AGAIN
- 16 DMA gets ROASTED by a JUDGE
- 17 DMA gets Shut Down by Officer
- 18 DMA is Very Happy with his Shirt and Threatens Lawsuits
- 19 DMA SPEAKS OUT!!! FRESH OUT OF JAIL!!!
- 20 Exclusive Interview with Frauditor DMA
- 21 Exposing DMA for Copyright Infringement
- 22 Frauditor DMA Ambushes Another Library
- 23 Frauditor DMA and KAREN haven MELTDOWN at Police Station
- 24 Frauditor DMA and SWEAT T ARRESTED on WARRANTS
- 25 Frauditor DMA ARREST Footage
- 26 Frauditor DMA Confronts the Snitch in his Organization
- 27 FRAUDITOR DMA FOUND GUILTY ON ALL CHARGES!!! FULL VERDICT!!!
- 28 Frauditor DMA gets Camera TOUCHED and CRIES A RIVER
- 29 Frauditor DMA Gets Confronted by Angry Citizen (Hilarious)
- 30 Frauditor DMA gets EXPOSED by City Council Members
- 31 Frauditor DMA gets OWNED by JUDGE + Frauditors Criminal Records Exposed!!!!
- 32 FRAUDITOR DMA GETS PRESSED BY ANGRY PUBLIC EMPLOYEE
- 33 Frauditor DMA gets ROASTED at Library
- 34 Frauditor DMA gets ROASTED by Citizens
- 35 Frauditor DMA has NEW CHARGES for VIOLATING RESTRAINING ORDER
- 36 Frauditor DMA is DOXING a Bounty Hunter
- 37 FRAUDITOR DMA IS IN DENIAL AFTER BEING FOUND GUILTY!!! + MUCH MORE!!!
- 38 Frauditor DMA is SCARED of the Police
- 39 Frauditor DMA is Threatening Officers and Public Employees
- 40 Frauditor DMA KICKED OUT of Private Event and ROASTED
- 41 FRAUDITOR DMA SENTENCING DAY!!! JAIL OR NO JAIL
- 42 Frauditor DMA VS Judge

- 43 Frauditor DMA Whines About Jail
- 44 FRAUDITOR DMA WILL FACE CHARGES FOR THIS (Must Watch)
- 45 FRAUDITOR DRAGGED OUT BY POLICE CHIEF!!! + DMA TRIAL INFO!!! + MUCH MORE!
- 46 Frauditor gets Confronted at Juvenile Detention Center
- 47 Frauditor is Hallucinating Numbers
- 48 Frauditor Karen and DMA have a MELTDOWN at Police Station
- 49 Frauditors are Harassing Patrons at the Library Again
- 50 Frauditors DMA and Karen and Threatening City Council
- 51 Frauditors DMA and KAREN get Feelings Hurt at Traffic Stop
- 52 Frauditors DMA and KAREN get IGNORED and LOSE THEIR MIND
- 53 Frauditors DMA and Karen get ROASTED at the Post Office
- 54 Frauditors DMA and Karens FAIL to AMBUSH Officer
- 55 Frauditors DMA and Karens get ROASTED by Angry Citizen
- 56 Frauditors Ejected from Federal Courthouse (NEW)
- 57 Frauditors get Denied Entry and Start Crying
- 58 Frauditors Karen and DMA cause MAYHEM at City Council Meeting
- 59 Frauditors Karen and DMA have Meltdown at Police Station
- 60 FRAUDITORS PULLED OVER AT GUNPOINT
- 61 Interview with DMA's Nemesis
- 62 Legendary Officer Trolls Denver Metro Audit
- 63 Older Lady VS DMA
- 64 Petition to DEMONETIZE Frauditor DMA (Ft. Tones Overthinks It)
- 65 TACO TERRY ARRESTED!!!! (NEW) + DMA Criminal Record
- 66 UPDATE OF FRAUDITOR DMA'S SENTENCING HEARING
- 67 Vile Frauditor DMA EXPLOITS a Tragedy