

1 SAWYER & LABAR LLP
2 ADRIAN SAWYER, State Bar No. 203712
3 *sawyer@sawyerlabar.com*
4 1700 Montgomery Street, Suite 108
5 San Francisco, California 94111
6 Telephone: 415.262.3820

7
8 Attorneys for NBCUniversal Media, LLC
9

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 IN RE: DMCA SECTION 512(h)
14 SUBPOENA TO GOOGLE LLC
15
16
17
18
19

Case No. 25-80396

**DECLARATION OF BRAXTON
PERKINS IN SUPPORT OF
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

1 I, Braxton Perkins, the undersigned, declare that:

2 1. I am the Senior Vice President of Analytics, Operations & Technology,
3 Intellectual Property for NBCUniversal Media, LLC (“NBCUniversal”), which is
4 authorized to act on behalf of its affiliate copyright owners, including Universal City
5 Studios Productions LLLP, in submitting takedown requests and requests for
6 subpoenas under the Digital Millennium Copyright Act (“DMCA”). As part of my
7 duties, I am responsible for monitoring and responding to copyright infringement.

8 2. I submit this declaration in support of NBCUniversal’s request for
9 issuance to Google LLC (“Google”) of a subpoena, pursuant to the DMCA, 17
10 U.S.C. § 512(h), to identify individual(s) who published content on Google’s
11 systems that infringed copyrighted works owned by NBCUniversal and its affiliates.

12 3. On October 28, 2025, a member of my team submitted a notification to
13 Google that identified a video published on its service, Google Drive, which
14 infringed NBCUniversal’s title, *Minions 3*. The notification provided all
15 information required by 17 U.S.C. § 512(c)(3)(A). A copy of the notification is
16 attached hereto as **Exhibit 1**.

17 4. Between October and November, 2025, members of my team also
18 submitted three notifications to Google that identified videos published on its
19 service, YouTube, which infringed copyrighted works owned by NBCUniversal and
20 its affiliates. These notifications provided all information required by 17 U.S.C. §
21 512(c)(3)(A).

22 5. First, on October 27, 2025, my team notified Google of a video
23 published on the YouTube channel, “CHOCOLATE BOB,” which infringed
24 NBCUniversal’s title, *Minions 3*. A copy of Google’s confirmation of that
25 notification is attached hereto as **Exhibit 2**.

26 6. Second, on November 22, 2025, my team notified Google of a video
27 published on the YouTube channel, “ChocloteBob,” which infringed
28

1 NBCUniversal's title, *Minions 3*. A copy of Google's confirmation of that
2 notification is attached hereto as **Exhibit 3**.

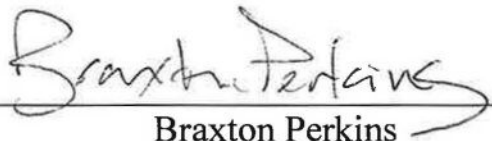
3 7. Third, on November 25, 2025, my team notified Google of a video
4 published on the YouTube channel, "mightyvortex5973," which infringed
5 NBCUniversal's title, *The Lorax*. A copy of Google's confirmation of that
6 notification is attached hereto as **Exhibit 4**.

7 8. NBCUniversal is requesting issuance of a subpoena that would order
8 Google to disclose the identities, including the names, physical addresses, IP
9 addresses, telephone numbers, and e-mail addresses, of the individual(s) that operate
10 the Google accounts that published the above-identified content on Google's
11 systems

12 9. The purpose for which this subpoena is sought is to obtain the identities
13 of the alleged infringer(s) who have exploited exclusive rights in copyrighted works,
14 without the copyright owners' authorization. The information obtained through this
15 subpoena will only be used for the purposes of protecting the copyright owners'
16 rights under U.S. Code, Title 17.

17
18 I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct to the best of my knowledge,
20 information or belief.

21 Executed at Los Angeles, California, on December 22, 2025.

22
23 
24 Braxton Perkins