

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Blatino Media, Inc.,)	
FlavaWorks Entertainment, Inc.,)	
)	
Plaintiffs,)	Case No. 1:25-cv-03397
)	
v.)	
)	Hon. John F. Kness
Nicolas Gaudet-Labrosse, et al.,)	
)	
Defendants.)	

STATUS REPORT

This Status Report is filed on behalf of the Plaintiffs pursuant to this Court’s order, dated February 5, 2026 (Dkt. #46), directing Plaintiff to update the Court on the status of service no later than February 20, 2026. The Court had previously, *sua sponte*, authorized Plaintiffs to serve Defendants for whom they had no known address(es) via email. (Dkt. #34.) Plaintiffs submit that they have complied with this Court’s order and have this case back on track to be resolved in a reasonable time, considering the sensitivity of the information about the Defendants that Plaintiffs seeks to disclose, and the on-going obfuscation by the third-party internet service providers (the “ISPs”).

A. PLAINTIFFS’ ATTEMPTS TO IDENTIFY AND LOCATE PROPER DEFENDANTS IN THIS CASE

The First Amended Complaint, filed on December 24, 2025 (Dkt. #27), named nine (9) individual Defendants (the “Known Defendants”), one of whom has since been dismissed, and additional, unnamed John Does 1–47, whose identities cannot be determined with reasonable certainty without third-party discovery [#13], which this Court granted on June 14, 2026 [#15] (permitting Plaintiff to serve limited discovery requests on: “Google LLC, Microsoft Corporation,

and Yahoo! Inc, to obtain information sufficient to identify the Doe Defendants by name and current address.”); *Bleicher Aff.*, attached as Exhibit A, at ¶¶14-19.

Plaintiffs did not display the names of the remaining Defendants because Plaintiffs did not wish to name individuals in a federal lawsuit unless and until Plaintiffs could confirm, with reasonable certainty, that the identified individuals were in fact the proper persons who engaged in the alleged infringing activity. Naming the wrong individuals in this Case could embarrass the individuals named, expose Plaintiffs to claims of abuse of process, and waste the Court’s resources. *Id.*, at ¶12.

Plaintiffs’ identification of the John Doe Defendants is based on email addresses associated with accounts on Plaintiffs’ membership websites that were used to download copyrighted content. However, an email address alone does not always reliably identify the individual behind the account. *Id.*, at ¶13.

Therefore, additional identifying information, which is solely in the possession of the ISPs that provided use of the email addresses, e.g., Google, Microsoft, Apple, etc. Plaintiffs served the relevant ISPs months ago and, although Microsoft and Google responded that they would provide at least some of the relevant, critical information months ago, they have not. Motions to compel may be necessary. *Id.*, at ¶¶15-19.

B. PLAINTIFFS’ EFFORTS TO SERVE DEFENDANTS VIA EMAIL

On February 5, 2026, the Plaintiffs served the Known Defendants via multiple email addresses discovered by the Plaintiff’s during their pre-filing investigation. (Dkt. #34.) Only one address was returned “undeliverable”: Defendant Grtunca’s yahoo.com account. The Complaint and Summons apparently was successfully receive by Grtunca at the three additional accounts discovered by Plaintiff and listed on the Certificate of Service. *Id.*, at ¶6.¶

On or about February 19, 2026, still not in possession of responses from the ISPs, Plaintiffs, out of an abundance of caution, served the remaining, unserved Defendants, via one or more email addresses that they used to establish their accounts on or more of Plaintiffs' websites. A copy of the Certificate of Service will be served contemporaneously herewith. Plaintiffs anticipate, that if this Case is not dismissed, Plaintiffs will proceed with either new subpoenas for documents or motions to compel against the ISPs. *Id.*, at ¶8.

Respectfully Submitted,

/s/ Patrick M. Jones

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CERTIFICATE OF SERVICE

Plaintiffs served a copy of the foregoing on the following Defendants via email on February 19, 2026:

The Plaintiffs will continue to attempt to locate the physical location of the Remaining Defendants and serve them through a process service, in addition to the service by email as set forth above.

Respectfully Submitted,

/s/ Patrick M. Jones
One of the Attorneys for the
Plaintiffs

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