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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
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20 IN RE: DMCA SECTION 512(h)
21 SUBPOENA TO REDDIT, INC.
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Case No, 25-80395

**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 Reddit, Inc. ("Reddit") of a subpoena, pursuant to the DMCA, 17 U.S.C.
10 § 512(h), to identify the individual operator(s) of a Reddit account that has infringed
11 copyrighted work owned by NBCUniversal and its affiliates.

12 3. On October 28, 2025, a member of my team submitted a notification to
13 Reddit identifying two posts on Reddit's systems that were published under the
14 username, DrChocolateBob, and linked to infringing copies of NBCUniversal's
15 forthcoming motion picture, *Minions 3*:

- 16 • https://www.reddit.com/r/despicableme/comments/1oilolv/minions_3_2026_movie_audio_only/
- 17 • <https://www.reddit.com/r/Minions/comments/1oh17hv/comment/nlwgl06/>

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19 4. The notification provided all information required by 17 U.S.C. §
20 512(c)(3)(A). A copy of the notification is attached hereto as **Exhibit 1**.


21 5. NBCUniversal is requesting issuance of a subpoena that would order
22 Reddit to disclose the identities, including the names, physical addresses, IP
23 addresses, telephone numbers, and e-mail addresses, of the individual(s) that operate
24 the Reddit account, DrChocolateBob.

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

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4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct to the best of my knowledge,
6 information or belief.

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

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9 
10 Braxton Perkins